United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [N] [ ]	[W][A][R][0][0][7][5][3][9]	[1][5][1][1][1][8]	[-]	[R]	[2]

Remarks

21 [ ] 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 [7][0] 69	70 [ ]	71 [ ]	72 [ ]	73 [ ][ ] 74	75 [ ][ ][ ][ ][ ][ ] 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Socco, Inc. 601 A West Front Street Sumas, Washington 98295	8:55 AM/ 11/18/15	01/02/15
	Exit Time/Date	Permit Expiration Date
	2:30 PM/ 11/18/15	12/31/19

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Gene Keller/Production Supervisor/(360) 998-4900 Gary Jones/Owner, President/(360) 927-4010	NAICS = 321999 SIC = 2421 Latitude: 48.992797 Longitude: -122.256739
Name, Address of Responsible Official/Title/Phone and Fax Number Same as above.	Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☑ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☑ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☑ Storm Water	
☑ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes | SEV Description

See the attached report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Joseph Roberto	EPA/OCE/(206) 553-1669	12/03/15
Jon Klemesrud	EPA/OCE/(206) 553-5068	12/03/15
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	EPA/OCE/ IEM4 3-0955	March 11, 2016

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS Entry 12-8-15

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit
B	Compliance Biomonitoring
C	Compliance Evaluation (non-sampling)
D	Diagnostic
F	Pretreatment (Follow-up)
G	Pretreatment (Audit)
I	Industrial User (IU) Inspection
J	Complaints
M	Multimedia
N	Spill
O	Compliance Evaluation (Oversight)
P	Pretreatment Compliance Inspection
R	Reconnaissance
S	Compliance Sampling
U	IU Inspection with Pretreatment Audit
X	Toxics Inspection
Z	Sludge - Biosolids
#	Combined Sewer Overflow-Sampling
$	Combined Sewer Overflow-Non-Sampling
+	Sanitary Sewer Overflow-Sampling
&	Sanitary Sewer Overflow-Non-Sampling
\	CAFO-Sampling
=	CAFO-Non-Sampling
2	IU Sampling Inspection
3	IU Non-Sampling Inspection
4	IU Toxics Inspection
5	IU Sampling Inspection with Pretreatment
6	IU Non-Sampling Inspection with Pretreatment
7	IU Toxics with Pretreatment
!	Pretreatment Compliance (Oversight)
@	Follow-up (enforcement)
{	Storm Water-Construction-Sampling
}	Storm Water-Construction-Non-Sampling
:	Storm Water-Non-Construction-Sampling
~	Storm Water-Non-Construction-Non-Sampling
<	Storm Water-MS4-Sampling
-	Storm Water-MS4-Non-Sampling
>	Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A —	State (Contractor)
B —	EPA (Contractor)
E —	Corps of Engineers
J —	Joint EPA/State Inspectors—EPA Lead
L —	Local Health Department (State)
N —	NEIC Inspectors
O —	Other Inspectors, Federal/EPA (Specify in Remarks columns)
P —	Other Inspectors, State (Specify in Remarks columns)
R —	EPA Regional Inspector
S —	State Inspector
T —	Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

NPDES
Inspection Report

Socco, Inc.
(NPDES Permit #: WAR007539)

Sumas, Washington

November 18, 2015

Prepared by:

Joe Roberto
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Gene Keller and/or Gary Jones or from observations during the inspection.)

I. Facility Information

Facility Name: Socco, Inc. (facility)
Note that the facility may also be doing business as Socco Forest Products

Owner and Operator: According to Mr. Gene Keller, Socco, Inc. owns the entire site as well as operates on a portion of the site. Mr. Keller also indicated that Cedarprime, Inc. operates on a portion of the site which it leases from Socco, Inc.

Available information on this facility also indicates other entities with ownership claims to the property. These entities include Sumas Cogeneration Co., LP and Sumas Properties, LLC. According to Mr. Keller, these other entities are now defunct and Socco, Inc. is the entity that currently owns the property.

Facility Contact(s):

Name	Title	Phone Number	Email Address
Gary Jones	Owner, President	(360) 988-4900	gjones@soccoforest.com
Gene Keller	Production Supervisor	(360) 988-4900	gkeller@soccoforest.com

Physical/Mailing Address: 601 A West Front Street
Sumas, Washington 98295

GPS Coordinates: +48.992797°/-122.256739°
(Obtained from the Ecology PARIS database.)

Receiving Water: Johnson Creek

Permit #: WAR007539

Number of Employees: 17

Length of Operation: Socco, Inc. began operating at this location in 1993, according to information obtained from the facility stormwater pollution prevention plan (SWPPP). See Attachment C for a copy of the SWPPP obtained at the time of the inspection.

Facility Size: Information available in the facility SWPPP indicates that the total area covered by the facility is 27.8 acres. This acreage includes the area operated by Cedarprime, Inc. (approximately 7.7 acres), the area operated by Socco, Inc. (approximately 7.3 acres), and undeveloped farm ground.

II. Inspection Information

Inspection Dates	November 18, 2015
Time Arrived	8:55 AM
Time Departed	2:30 PM
Weather Condition	Clear and Dry
Facility Representatives Present	Gary Jones Gene Keller
EPA Inspection Team	Joe Roberto (Lead Inspector) Jon Klemesrud
Observed Discharge	I saw a stormwater discharge on the day of the inspection.

III. Scope of Inspection

The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the Washington Industrial Stormwater General Permit (ISGP) and Section 402 of the Clean Water Act. For this facility, this meant evaluating the management of stormwater at the site.

In general, this inspection consisted of an opening conference to discuss the purpose and expectations of the inspection, a facility tour to inspect potential stormwater impacted areas of the site, a records review, and a closing conference to discuss the areas of concern identified during the inspection.

We did not collect samples at the time of this inspection.

IV. Inspection Entry

Specifics regarding entry to this facility are as follows:

- Arrival at the facility was unannounced.
- We (the inspection team) presented credentials to Mr. Gene Keller and Mr. Gary Jones upon arriving at the facility.
- I (Joe Roberto) explained to Mr. Keller and Mr. Jones that this visit was a compliance inspection to determine compliance with the ISGP and the Clean Water Act.
- Facility representatives did not deny us access to the facility.
- Mr. Keller accompanied us throughout the inspection.

- We were allowed to inspect all areas of the facility that we wished to inspect.

V. Compliance History

Date of Last Inspection:	This facility has not been inspected in at least the last five years. This is based on a conversation with Kurt Baumgarten (Ecology).
Enforcement Actions:	This facility has not been issued a penalty or compliance order for purposes of compliance with the ISGP. This information is based on a conversation with Kurt Baumgarten (Ecology).

VI. Facility Description/Background

As indicated earlier in this report, Socco, Inc. owns the entire facility which covers approximately 27.8 acres. Socco, Inc. operates a lumber remanufacturing and kiln drying operation on approximately 7.3 acres of the 27.8 acre facility. According to Mr. Keller, Socco, Inc. operates the following areas: the kilns at the facility, the three stormwater retention ponds, a lumber storage area, and the Socco sticker stacker building.

Socco, Inc. also leases approximately 7.7 acres of the facility to Cedarprime, Inc. According to the facility SWPPP, Cedarprime, Inc. is a wood products operation that re-manufactures cedar lumber by converting low grade cedar into high quality finished boards and exterior siding using sawing and finger jointing processes. According to Mr. Keller, Cedarprime, Inc. has leased this property from Socco, Inc. for the past 13 or 14 years. Mr. Keller also indicated that the 7.7 acre portion of the facility operated by Cedarprime, Inc. includes a 42,800 square foot cedar siding manufacturing plant, and a 9,100 square foot and a 7,500 square foot storage building.

In addition to the areas where industrial activities are occurring at the facility, the facility also includes several acres of undeveloped farm ground. As indicated above, this undeveloped ground is also owned by Socco, Inc.

Although there are two entities operating at this facility, the SWPPP for this facility is written such that Socco, Inc. is responsible for the management of all stormwater activities occurring at the facility whether operated by Socco, Inc. or Cedarprime, Inc. This conclusion is based on language established in the SWPPP and on the fact that the SWPPP was signed and certified by a Socco, Inc. representative. As a result, unless otherwise indicated, the term "facility" in the remainder of this report refers to the entire facility whether operated by Socco, Inc. or Cedarprime, Inc.

In general, other than the undeveloped areas of the facility and the area covered by the stormwater detention ponds, all areas of the facility consist of building structures or are covered by an impervious surface such as asphalt pavement. Thus, all industrial

activities occurring at this facility are conducted in an area with an impervious surface.

This facility is designed such that all stormwater generated at this facility is routed to one of three stormwater detention ponds. Each of these stormwater ponds ultimately discharges stormwater to the roadside ditch along Front Street located north of the facility. Stormwater entering this Front Street ditch ultimately enters Johnson Creek east of the facility.

See Attachments A and B of this report for details regarding the main components at this facility. See also Attachment C, the facility SWPPP, for details regarding the activities at this facility.

VII. Permit Information

According to information available in the Washington Department of Ecology Permit and Reporting Information System (PARIS) database, Socco, Inc. is covered under a Washington ISGP (Permit # WAR007539). Available information indicates that the Washington Department of Ecology issued the facility a permit effective January 2, 2015. See Attachment D.

PARIS indicates that the facility was previously covered by the 2010 ISGP. I did not obtain a copy of the permit coverage letter issued for the earlier (2010) version of the ISGP.

Another piece of permit related information that is worthy of mention for this facility pertains to an apparent discrepancy on the facility's NOI. The NOI requested permit coverage for a facility with an area of 8.7 acres. The acreage identified in the NOI is significantly smaller than the 27.8 acres encompassing the facility. This size discrepancy brings up questions regarding which portions of the facility are currently covered by the ISGP. See the "Areas of Concern" section of this report for additional details regarding this facility size discrepancy.

VIII. Permit Applicability and Requirements

The facility's NOI for coverage under the ISGP indicates that the primary Standard Industrial Classification (SIC) code for the activity conducted at this facility is 2421 (Sawmills and Planing Mills, General). According to Condition S1 of the ISGP, facilities that fall under SIC code 2421 are eligible for permit coverage under the ISGP. See Attachment E of this report for a copy of the NOI submitted for this facility for coverage under the ISGP.

Coverage under the ISGP means that this facility is responsible for complying with ISGP requirements including the following:

- Develop and implement a SWPPP to cover stormwater related activities at the

facility as established in Condition S3.A.1 of the ISGP.

- Conduct and document visual facility inspections as established in Condition S7.A.1 of the ISGP. These inspections must be conducted monthly.
- Conduct quarterly benchmark monitoring for turbidity, pH, oil sheen, copper, and zinc as established in Condition S4 and Table 2 of the ISGP.
- Conduct quarterly benchmark monitoring for COD and TSS as established in Table 3 of the ISGP.
- Prepare and submit discharge monitoring reports (DMRs) which document the results of quarterly benchmark monitoring as established in Condition S9.A of the ISGP.
- Perform corrective actions to assure that stormwater discharges from the facility are achieving benchmark limitations as established in Condition S8 of the ISGP.
- Prepare and submit an annual report to Ecology that documents the corrective actions conducted during the calendar year as established in Condition S8.B of the ISGP.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the "Areas of Concern" section of this report.

IX. Facility Tour

During the facility tour we examined all areas occupied by this facility including the outdoor material storage areas, indoor processing areas, chemical storage areas, kilns, storm drains, stormwater detention ponds, stormwater outfalls, and the vicinity of the sample collection locations. Note, however, that we did not inspect the areas inside the buildings operated by Cedarprime, Inc.

See the facility site plan, included as Attachment A of this report, which shows the major components of the facility. See also Attachment B of this report which is photographic documentation of the facility as seen during the facility tour.

X. Records Review

As part of the inspection, I requested that the following documents be produced for review:

- **Monthly Visual Inspection Reports** – At the time of the inspection, I asked facility representatives to provide the last five years of monthly visual inspection reports for

the facility. Facility representatives indicated that they do not conduct monthly visual inspections. Instead, these inspections are conducted quarterly. See Attachment F of this report for an example of a visual inspection report.

- **SWPPP** – At the time of the inspection, I asked facility representatives for a copy of the latest SWPPP for the facility. Facility representatives provided a SWPPP dated September 2011. See Attachment C of this report for a copy of this SWPPP.

- **Discharge Monitoring Reports (DMRs)** – At the time of the inspection, I requested to see the past five years of DMRs for the facility. Facility representatives produced the DMRs as requested. See Attachment G of this report for a copy of a DMR.

- **Training Records** – At the time of the inspection, I asked for employee training records for the past five years. Facility representatives were not able to produce any training records for this time period.

Note that the review of the above documents was not a comprehensive review designed to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

Any records deficiencies observed are listed in the "Areas of Concern" section of this report.

XI. Stormwater Generation, Treatment and Discharge

As indicated earlier in this report, other than the area covered by the stormwater detention ponds, the active area of the facility (which is approximately 15 acres) is covered by an impervious surface consisting of either building structures or pavement such as asphalt.

The operation of this facility is such that all precipitation falling within the active industrial area footprint of the facility is collected in storm drains and routed to one of three stormwater detention ponds at the facility. These detention ponds are equipped with an overflow structure. Overflows from each of these ponds are routed to the roadside ditch located along Front Street, north of the facility. Stormwater entering this roadside ditch ultimately flows to Johnson Creek according to the facility's SWPPP. See Attachments A, B, and C of this report for details of the stormwater handling system at this facility.

In addition to stormwater, this facility is also plumbed such that steam condensate from the kilns is routed through the stormwater handling system and commingled with stormwater which is ultimately discharged to Johnson Creek. See the "Areas of Concern" section of this report for details regarding this steam condensate (or non-stormwater) discharge.

XII. Receiving Water

As indicated earlier in this report, facility representatives indicated that stormwater from the three stormwater detention ponds at this facility discharge to the roadside ditch along Front Street located north of the facility. Stormwater in this ditch ultimately flows to Johnson Creek, located east of the facility. This information is corroborated by information in the facility's NOI (see Attachment E of this report) which indicates that the discharge from this facility is to the Front Street drainage ditch and in the SWPPP for this facility which specifies that stormwater from the facility ultimately flows to Johnson Creek. See Attachment C of this report for a copy of the facility SWPPP.

Note that I did not follow (to confirm or verify) the discharge pathway leading from the stormwater detention ponds to Johnson Creek at the time of the inspection. As a result, the conclusion that discharges from the facility reach Johnson Creek is based solely on the statements obtained from facility representatives and on the documentation mentioned above.

XIII. Areas of Concern

At the time of the inspection I identified several areas of concern. Specifically, the concerns at this facility are identified as follows:

A. <u>Permit Coverage Area Discrepancy</u>

The most recent NOI submitted for the facility indicates that the facility size for which permit coverage is being requested is 8.7 acres. However, the facility description in the SWPPP obtained at the time of the inspection indicates that the total area covered by the SWPPP is 27.8 acres.

Subsequent to the inspection, I contacted Mike DiSpigno (the consultant who prepared the NOI for the facility). Mr. DiSpigno indicated that the facility size identified in the most recent submittal of the NOI is a typo. He also indicated that the NOI should have identified a facility size of approximately 15 acres to reflect the active industrial areas of the facility which includes areas operated by both Socco, Inc. (7.3 acres) and Cedarprime, Inc. (7.7 acres). See Attachment H of this report for a copy of a Modification of Permit Coverage Form, dated March 2, 2016, requesting that the NOI be modified to reflect a facility size of 15 acres instead of 8.7 acres.

The concerns regarding the above permit coverage area discrepancy are as follows:

1. Since the active industrial area of the facility is approximately 15 acres and since the facility only requested permit coverage for 8.7 acres, it is unclear whether the entire facility is covered by the ISGP. As a result, a portion of the facility may not be authorized to discharge stormwater.

2. In addition, even if 8.7 acres of the facility were permitted to discharge stormwater, the NOI is not explicit about the specific area of the facility that constitutes the 8.7 acres identified in the NOI. As a result, 8.7 acres of the facility could be permitted under the ISGP, however, it is unclear which 8.7 acres of the facility would be permitted.

B. Process Wastewater Discharge

Several of the conditions in the ISGP provide discussion about the types of discharges that are authorized under the permit. Condition S1.A. of the ISGP states that "Beginning on the effective date of this permit and lasting through its expiration date, the Permittee is authorized to discharge stormwater and conditionally approved non-stormwater discharges to waters of the state."

Condition S5.D.2. of the ISGP identifies the types of non-stormwater discharges that are conditionally authorized by the ISGP. These discharges include:

- discharges from firefighting activities,
- fire protection system flushing, testing and maintenance,
- discharges of potable water including water line flushing,
- uncontaminated air conditioning or compressor condensate,
- landscape watering and irrigation drainage,
- uncontaminated ground water or spring water,
- discharges associated with dewatering of foundations, footing drains, or utility vaults where flows are not contaminated, and
- incidental windblown mist from cooling towers that collects on rooftops or areas adjacent to the cooling towers.

In addition to the above, Condition S5.E. of the ISGP specifies the discharges prohibited by this permit. This condition of the permit specifically states that "The discharge of process wastewater is not authorized" and that "Stormwater that commingles with process wastewater is considered process wastewater."

Also, Appendix 2 (Definitions) of the ISGP provides definitions for various terms used in the ISGP. These definitions include the following:

- Stormwater which "means that portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes and other features of a stormwater drainage system..." and

- Process Wastewater which "means any non-stormwater which, during manufacturing or processing comes in direct contact or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product. If stormwater commingles with process wastewater, the commingled water is considered process wastewater."

At the time of the facility tour portion of the inspection, I inspected the area in the vicinity of the drying kilns. This included inspection of storm drains in the vicinity of the kilns. Facility representatives indicated that the facility is operated such that steam condensate from the kilns enters these nearby storm drains. This results in the commingling of steam condensate with stormwater collected at the facility and the ultimate discharge of the steam condensate to Johnson Creek. See Attachment A and photograph #s 2 to 6 of Attachment B for details of the steam condensate handling system.

Steam condensate produced from the kilns does not meet the definition of stormwater as described in the ISGP. The steam condensate discharge meets the definition of process wastewater, which is specifically identified as a prohibited discharge in the ISGP. As a result, discharging steam condensate through the facility stormwater handling system is not consistent with the requirements of the ISGP.

Note that facility representatives indicated that the amount of steam condensate entering the stormwater collection system was minimal. However, they did not have an estimate of the flow or volume of condensate entering the stormwater collection system.

C. Working Relationship Between Socco, Inc. and Cedarprime, Inc.

As indicated earlier in this report, the facility is covered by the ISGP. Coverage under the ISGP authorizes a permittee to discharge stormwater provided that conditions of the permit are achieved. One of the requirements under the ISGP is that the permittee develop and implement a SWPPP which establishes how stormwater at the facility will be managed.

As part of the inspection of the facility, I obtained a copy of the SWPPP for the facility. This SWPPP is dated September 2011 and is included in this report as Attachment C. Page 3 of the SWPPP is a log identifying the amendments to the SWPPP. The most recent amendment, dated September 28, 2011, specifies that the purpose for this amendment is to "Update entire plan to include combining Socco and Cedarprime sites into one Plan, revision to stormwater conveyance system, and meet 2010 DOE Industrial Permit requirements."

Being covered by the ISGP and having a SWPPP generally means that the permittee has operational control over all stormwater management at the entire facility. In this instance, the permittee is Socco, Inc. and the area covered (according to the SWPPP) encompasses both Socco, Inc. operated areas as well as Cedarprime, Inc. operated areas. The implication of the language in the SWPPP is that Socco, Inc. must manage stormwater throughout the entire facility. This includes conducting visual inspections and other activities required by the permit on all areas of the facility including the areas operated by Cedarprime, Inc.

At the time of the inspection, Mr. Gene Keller indicated that Socco, Inc. was responsible for stormwater related activities at the facility. He also indicated that

the SWPPP covers the stormwater activities on both the Socco, Inc. operated areas as well as the Cedarprime, Inc. operated areas of the facility. However, during the facility tour portion of the inspection, I asked Mr. Keller whether he conducted the monthly visual inspection of the Cedarprime operated areas as well as the Socco operated areas of the facility. He responded by saying that he only conducted the inspection of the Socco portion of the facility and that Cedarprime was responsible for their own inspection of the areas they operated.

The concerns regarding the relationship between Socco, Inc. and Cedarprime, Inc. as it relates to industrial stormwater are as follows:

1. The scenario outlined in the SWPPP indicates that Socco, Inc. is responsible for all stormwater related activities on the entire site including monthly visual inspections. However, Socco, Inc. representatives indicated that they are only managing stormwater activities on the Socco, Inc. operated areas of the facility. They are not managing the Cedarprime operated areas of the facility. Facility representatives indicated that Cedarprime, Inc. is responsible for managing their own stormwater. This approach to stormwater management at this facility is inconsistent with the approach identified in the facility SWPPP.

2. At the time of the inspection, I asked facility representatives if they were willing to be responsible (or held liable) for activities in areas operated by Cedarprime, Inc. The response I received from Socco, Inc. facility representatives was that they were not willing to take on that responsibility. It is apparent that Socco, Inc. representatives are not fully aware of the ramifications associated with covering the Cedarprime operation under their permit and SWPPP.

D. <u>Uncovered Dumpsters</u>

Condition S3.B.4.b. of the ISGP states that "The permittee shall include each of the following mandatory BMPs in the SWPPP and implement the BMPs..." This includes Condition S3.B.4.b.i.2.d which specifies good housekeeping practices including "The Permittee shall keep all dumpsters under cover or fit with a lid that must remain closed when not in use."

In addition to the above, Part 5.1.2 of the facility SWPPP states that a mandatory requirement is to "Keep all dumpsters under cover or fit with a lid that must remain closed when not in use."

At the time of the facility tour portion of the inspection, I saw several open dumpsters stored outdoors near the southeast corner of the Cedarprime, Inc. operating area of the facility. See photograph #9 of Attachment B of this report for a view of these open dumpsters.

I also saw other open dumpsters stored outdoors at the facility. See photograph #s 7 and 8 of Attachment B of this report for a view of these open dumpsters.

The concern is that these dumpsters are not stored under cover or fitted with a lid as required in the ISGP and the SWPPP.

E. Secondary Containment

Condition S3.B.4.b.i.4.a of the ISGP states that the Permittee shall "Store all chemical liquids, fluids, and petroleum products, on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater."

During the facility tour portion of the inspection, I saw a container at the facility stored without secondary containment. This container (a black barrel) was located in a material storage area operated by Socco, Inc. According to facility representatives, this barrel contains a tar like substance used to coat the kiln walls. This barrel did not have secondary containment as required by the ISGP. See photograph #1 of Attachment B of this report for a view of this barrel.

F. pH Holding Time

Table 2 in Condition S5 of the ISGP specifies several of the parameters that must be analyzed by the permittee, including pH.

Condition S4.C of the ISGP states that "The Permittee shall ensure that analytical methods used to meet the sampling requirements in this permit conform to the latest revision of the Guidelines Establishing Test Procedures for the Analysis of Pollutants contained in 40 CFR Part 136."

40 CFR Part 136 specifies, among other things, the sample holding times for various parameters. This part of the code of federal regulations specifies that pH must be analyzed immediately (or within fifteen minutes) after sample collection.

At the time of the inspection, I asked Mr. Keller what sample parameters were analyzed in-house and what sample parameters were analyzed offsite. Mr. Keller indicated that all samples were analyzed by an offsite lab. I indicated to Mr. Keller that the holding time for pH analysis was 15 minutes and that if a sample is sent to an offsite laboratory the holding time for pH will likely be exceeded.

As part of the inspection, I asked facility representatives to provide me with a copy of one of the DMRs prepared for the facility. For this inspection, I randomly selected the DMR prepared for the 1st quarter of 2014. See Attachment G of this report for a copy of this DMR and for supporting documentation.

Review of the 1st quarter 2014 DMR information indicates that samples were collected at sample points SP1 and SP2 at 1:10 PM and 1:15 PM, respectively on March 11, 2014. This information also indicates that the samples were received at Avocet Environmental Testing Laboratory at 4:00 PM later that day. This information indicates that it took almost three hours from the time the samples were collected at the facility to the time the samples were delivered to the

laboratory which indicates an exceedance of the 15 minute holding time for pH sample analysis.

Sending pH samples to an offsite laboratory will likely result in the exceedance of the 15 minute holding time and may lead to unrepresentative sampling results.

Note that although facility representatives indicated that all quarterly samples have been analyzed by an offsite laboratory, I did not collect chain of custody forms or other supporting sampling documentation for any quarters other than the 1st quarter of 2014. As a result, I cannot definitively show the exceedance of the pH holding time during these other quarters.

G. Annual Training

Condition S3.B.4.b of the ISGP states that "The permittee shall include each of the following BMPs in the SWPPP and implement the BMPs."

This includes condition S3.B.4.b.i.5 of the ISGP which states that "The SWPPP shall include BMPs to provide SWPPP training for employees who have duties in the areas of industrial activities subject to this permit." This condition of the permit specifies that the permittee shall train employees annually, at a minimum. This condition of the permit also specifies that a training plan shall include a log of the dates on which specific employees received training.

The facility SWPPP also contains similar training requirements. The SWPPP contains a BMP that specifies that employees receive training at least annually. Part 5.1.5. of the SWPPP specifies that "A formal training session will be conducted by the SWPPP Team for all personnel who have duties that may be affected by the provisions of the General Permit. Training will be conducted annually, unless conditions or personnel changes indicate that more frequent training is necessary…"

Part 5.1.5. of the SWPPP also specifies that a training log be kept as part of the SWPPP. This part of the SWPPP states that "Training records are maintained onsite by the Human Resources/Safety Coordinator. A training log is included in Appendix F of this SWPPP and will be updated annually."

At the time of the inspection, I asked facility representatives if employees were trained at least annually. Mr. Keller indicated that employees did not get formal training annually. Instead, Mr. Keller indicated that employees are trained through discussions that occur on an ongoing and as-needed basis. During these discussions, topics such as spill response and good housekeeping are discussed.

In addition, I asked Mr. Keller whether any of these discussions/training were documented. Mr. Keller said that these discussions were not documented.

The concern is that annual employee training is not conducted and documented as required in the ISGP and the SWPPP.

H. Visual Inspection Frequency

Condition S7.A.1 of the ISGP states that "The Permittee shall conduct and document visual inspections of the site each month."

A similar requirement is established in Part 7.1 of the SWPPP which states that "Visual inspections of the stormwater facilities and BMPs shall be conducted and documented each month."

At the time of the inspection, I asked facility representatives to provide the monthly visual inspection reports prepared for visual inspections conducted in the past five years. Mr. Keller responded by saying that visual inspections are conducted quarterly, not monthly. Mr. Keller also indicated that the visual inspections conducted at the facility in the past five years were conducted on the following dates:

- 2011 - February 25, May 23, September 22, and November 30,
- 2012 - February 21, May 2, August 23, and November 21,
- 2013 - March 5, May 7, August 16, and November 20,
- 2014 - March 5, May 26, September 11, and December 17, and
- 2015 - March 12, May 6, August 27, and November 10

This implies that since February 2011 monthly visual inspections were not conducted on the following months:

- 2011 - March, April, June, July, August, October, and December
- 2012 - January, March, April, June, July, September, October, and December
- 2013 - January, February, April, June, July, September, October, and December
- 2014 - January, February, April, June, July, August, October, and December
- 2015 - January, February, April, June, July, September, October, and December

Conducting visual inspections once per quarter is not consistent with the monthly visual inspection frequency required by Condition S7.A.1. of the ISGP and in Part 7.1 of the SWPPP.

I. Visual Inspection Report Deficiencies

Condition S7 of the ISGP identifies the visual inspection requirements of the permit. These requirements include the identification of the components that must be evaluated during a visual inspection and the information that must be recorded in a visual inspection report. Information that must be recorded in visual inspection reports include the information listed in the following table. This table identifies the visual inspection report requirement as well as the citations identifying where these requirements are located in the ISGP and the SWPPP.

ISGP Citation	SWPPP Citation	Visual inspection reports must include:
S7.B.3 and S7.C.1	7.1.3 and 7.2	"Observations of the presence of illicit discharges such as domestic wastewater, noncontact cooling water, or process wastewater…"
S7.B.4 and S7.C.1	7.1.4 and 7.2	"A verification that the descriptions of potential pollutants required under this permit area accurate."
S7.B.5 and S7.C.1	7.1.5 and 7.2	"A verification that the site map in the SWPPP reflects current conditions."
S7.C.1.a	7.2.a	"Time and date of inspection."
S7.C.1.c	7.2.c	"Statements that, in the judgement of 1) the person conducting the site inspection, and 2) the person described in Condition G2., the site is either in compliance or out of compliance with the terms and conditions of the SWPPP and this permit."
S7.C.1.e	7.2.e	"Name, title, and signature of the person conducting site inspection; and the following statement: I certify that this report is true, accurate, and complete, to the best of my knowledge and belief."
S7C.1.f	7.2.f	"Certification and signature of the person described in Condition G2.A, or a duly authorized representative of the facility, in accordance with Condition G2.B and D."

At the time of the inspection, I obtained information regarding the visual inspections conducted at the facility. I also obtained a copy of the visual inspection report prepared for the August 2015 visual inspection. According to Mr. Keller, the inspection report form used in the August 2015 visual inspection is the same form he has always used at this facility. See Attachment F for a copy of this visual inspection report.

Based on review of the August 2015 visual inspection report, I identified that this report did not contain the information necessary to satisfy any of the visual inspection report requirements established in the table above. Not including the information identified in the table above is inconsistent with requirements in the ISGP and the SWPPP.

J. Baghouse Inspection and Maintenance

Condition S3.B.4.b. of the ISGP states that "The permittee shall include each of the following mandatory BMPs in the SWPPP and implement the BMPs…" This includes Condition S3.B.4.b.i.2.c which states that the Permittee shall "Inspect and maintain bag houses monthly to prevent the escape of dust from the system…" A similar requirement to inspect and maintain bag houses is also established in Part 5.1.2 of the facility SWPPP.

At the time of the inspection, I asked Mr. Keller how often the bag houses at the facility were inspected and maintained. Mr. Keller indicated that they inspect the bag house on their property annually or as needed.

Mr. Keller also indicated that he did not inspect or maintain the bag house located on the Cedarprime operation. Instead, he indicated that Cedarprime, Inc. was responsible for inspecting and maintaining the bag house on their operation.

The concern is that the baghouses at this facility are not being inspected and maintained as required in Condition S3.B.4.b.i.2.c of the ISGP and in Part 5.1.2 of the SWPPP.

XIV. Closing Conference

Prior to concluding the inspection, I held a closing conference with Mr. Keller and Mr. Jones on November 18, 2015. The purpose of this closing conference was to discuss the preliminary findings of the inspection. I discussed the areas of concern listed above and then I thanked Mr. Keller and Mr. Jones for their time and assistance with the inspection.

Report Completion Date: March 10, 2016

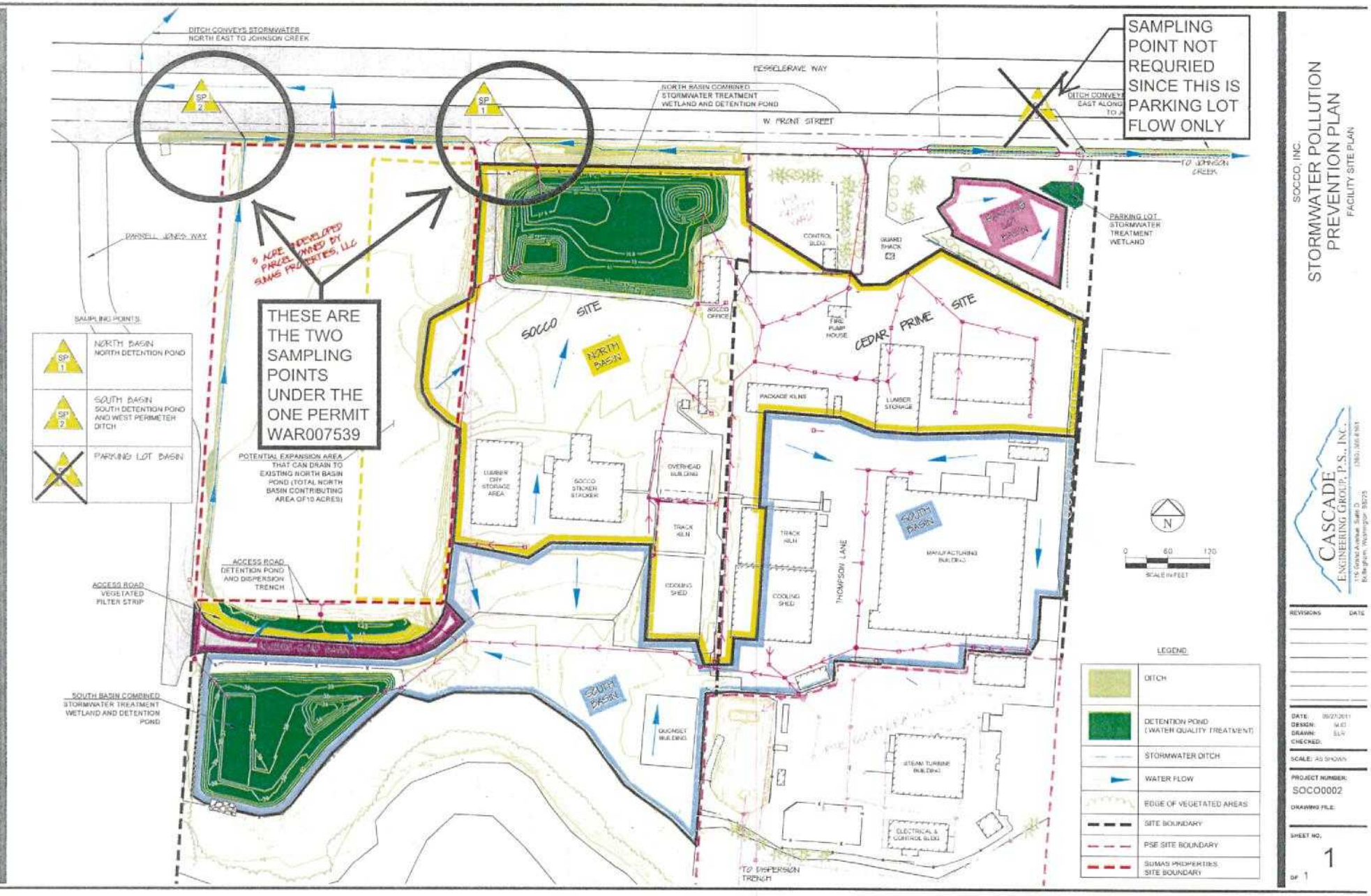
Lead Inspector Signature: Jon L. S. [illegible]

ATTACHMENT A

Facility Site Plan

(Map Obtained From Facility Representatives)

Socco, Inc.



SOCCO, INC.

STORMWATER POLLUTION PREVENTION PLAN

FACILITY SITE PLAN

CASCADE ENGINEERING GROUP, P.S., INC.
175 Grand Avenue, Suite D (360) 306-8161
Bellingham, Washington 98225

REVISIONS	DATE

DATE: 05/27/2011
DESIGN: MJD
DRAWN: SLH
CHECKED:

SCALE: AS SHOWN

PROJECT NUMBER: SOCO0002

DRAWING FILE:

SHEET NO. 1 OF 1

ATTACHMENT B

Photograph Documentation

Unless otherwise noted, all photographs were taken by Jon Klemesrud on November 18, 2015.

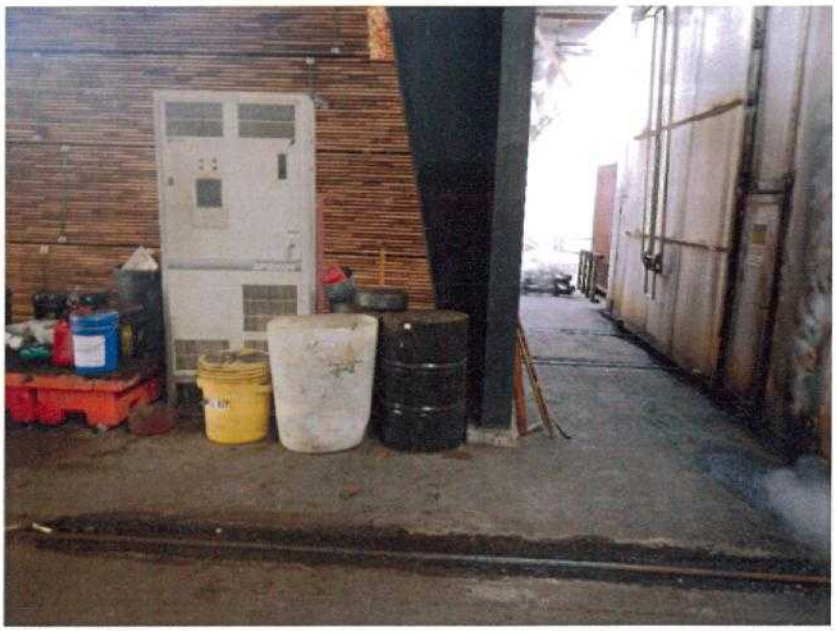


Photo #1: View of a chemical storage area located in the vicinity of the track kiln. Note the black barrel that does not have secondary containment. Mr. Gene Keller indicated that this black barrel contains a tar like substance used to coat the kiln walls. Camera photo #DSCN0939.

Photo #2: View along the front of the track kiln. These kilns were installed in 1993. According to Mr. Gene Keller, condensate from these kilns collects in the gravel trench in front of the kilns. Mr. Keller also said that condensate entering this gravel trench infiltrates into the ground. Camera photo #DSCN0941.

Photo #3: View in the vicinity of the track kiln shown in the previous photograph. Note the roof downspout entering the storm drain. Also note the steam exiting this storm drain. According to facility representatives the steam exiting this storm drain is likely the result of condensate from other kilns at the facility entering the stormwater drainage system at the facility. Camera photo #DSCN0942.

Photo #4: Southerly view showing the package kilns at the facility. These kilns were installed in 2001. According to facility representatives, steam condensate from these kilns is routed to the stormwater collection system at the facility. Camera photo #DSCN0951.

Photo #5: View of a drain located outside the package kilns shown in the previous photograph. According to facility representatives, this drain routes steam condensate from the package kilns to the stormwater collection system at the facility. Camera photo #DSCN0958.

Photo #6: View in the vicinity of the track kilns which were installed in 2010. Note the storm drain located in the vicinity of these kilns. According to facility representatives, steam condensate from these kilns is routed to the stormwater collection system at the facility. Camera photo #DSCN0959.

Photo #7: View of one of the open dumpsters at the facility. Note the storm drain in the vicinity of this open dumpster. Camera photo #DSCN0950.

Photo #8: View of another open dumpster located at the facility. Camera photo #DSCN0960.

Photo #9: Easterly view showing open dumpsters situated near the southeast corner of the facility on an area operated by Cedarprime, Inc. Camera photo #DSCN0948.

Photo #10: Westerly view showing the south stormwater pond. Camera photo #DSCN0963.

Photo #11: Northeasterly view showing the north stormwater pond. Camera photo #DSCN0973.

Photo #12: View in the vicinity of the ditch along Front Street. Camera photo #DSCN0969.

ATTACHMENT C

Stormwater Pollution Prevention Plan

Dated: September 2011

Socco, Inc.

SOCCO , INC.

SUMAS, WASHINGTON

INDUSTRIAL STORMWATER GENERAL PERMIT
STORMWATER POLLUTION PREVENTION PLAN

Prepared for:

SOCCO, INC.
601A West Front Street
Sumas, WA 98295

Prepared by:

Cascade Engineering Group, P.S., Inc.
119 Grand Avenue, Suite D
Bellingham, WA 98225
(360) 306-8161

September 2011

CASCADE
ENGINEERING GROUP, P.S., INC.

TABLE OF CONTENTS

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1.0 INTRODUCTION

1.1 LOG OF AMENDMENTS TO THE PLAN

Date	Section Amended	Individual Making Change	Description of Amendment and its Purpose
June 2, 2006		David Evans and Associates, Inc.	Preparation of initial Industrial Permit SWPPP.
May 16, 2008		David Evans and Associates, Inc.	Preparation of initial Industrial Permit SWPPP for Lot B (Cedarprime Site)
Sept. 28, 2011		Cascade Engineering Group, P.S., Inc.	Update entire plan to include combining Socco and Cedarprime sites into one Plan, revision to stormwater conveyance system, and meet 2010 DOE Industrial Permit requirements.

1.2 SWPPP CERTIFICATION FORM

APPENDIX 3 - SWPPP CERTIFICATION FORM

The Permittee shall use this form to sign and certify that the Stormwater Pollution Prevention Plan (SWPPP) is complete, accurate and in compliance with Conditions S3 and S8 of the Industrial Stormwater General Permit.

- A SWPPP certification form needs to be completed and attached to all SWPPPs.
- Each time a Level 1, 2, or 3 Corrective Action is required, this form needs to be re-signed and re-certified by the Permittee, and attached to the SWPPP.

Is this SWPPP certification in response to a Level 1, 2 or 3 Corrective Action? ☐Yes ☐No

If Yes:

- Type of Corrective Action?: ☐Level 1 ☐Level 2 ☐Level 3
- Date SWPPP update/revision completed:_____

"I certify under penalty of law that this SWPPP and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate information to determine compliance with the Industrial Stormwater General Permit. Based on my inquiry of the person or persons who are responsible for stormwater management at my facility, this SWPPP is, to the best of my knowledge and belief, true, accurate, and complete, and in full compliance with Permit Conditions S3 and S8, including the correct Best Management Practices from the applicable Stormwater Management Manual. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

GARY JONES — Operator's Printed Name *

GENERAL MANAGER — Title

Gary A Jones — Operator's Signature *

7/1/12 — Date

* Federal regulations require this document to be signed as follows:
For a corporation, by a principal executive officer of at least the level of vice president;
For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
For a municipality, state, federal, or other public facility, by either a principal executive officer or ranking elected official.

This document shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

1. The authorization is made in writing by a person described above and submitted to the Ecology.
2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

Changes to authorization. If an authorization under number 2 above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of number 2 above shall be submitted to Ecology prior to, or together with, any reports, information, or applications to be signed by an authorized representative.

1.3 Purpose and Scope

This Stormwater Pollution Prevention Plan (SWPPP) establishes the pollution prevention project team and Best Management Practices (BMPs) necessary to identify, reduce, eliminate, and/or prevent the discharge of stormwater pollutants in compliance with Section S9 of the Washington State I*ndustrial Stormwater General Permit (General Permit)*, issued October 21, 2009 with Effective Date of Modification January 1, 2010 – see Appendix A for a copy of the General Permit. Coverage under the Industrial Stormwater General Permit is required pursuant to 40 CFR Subpart 122.26, "Storm Water Discharges".

A copy of the SWPPP will be retained onsite or within reasonable access of the site at all times. The SWPPP will be made available to Department of Ecology (Ecology) personnel upon request.

1.4 Facility Information

Facility Name
Socco, Inc.

Facility Type
Lumber drying, lumber re-manufacturing, packaging and storing

Date of Initial Operation
Socco - 1993
Cedarprime - 2002

Facility Location

Socco, Inc.
601 A West Front Street
Sumas, Washington 98295
(360) 988-4900

Cedarprime
601 C West Front Street
Sumas, Washington 98295
(360) 988-2120

Owner Name and Address

Owner of Equipment and Buildings:	Socco, Inc. 601 A West Front Street Sumas, Washington 98295 (360) 988-4900
Lessee:	Cedarprime, Inc. (7.6 acres in northeast corner of site)
Land Owner:	Socco, Inc. 601 A West Front Street Sumas, Washington 98295 (360) 988-4900 Sumas Properties, LLC (5 acre parcel west of Socco facility) 10800 NE 8th Street, Suite 320 Bellevue, WA 98004-4467 (425) 889-1000

FIGURES

- Figure 1 Vicinity Map (See page 4 of Plan)
- Figure 2 SWPPP Facility Site Map

2.0 SITE MAP

2.1 VICINITY MAP

The Socco, Inc. facility is located at 601 West Front Street in Sumas, Washington.

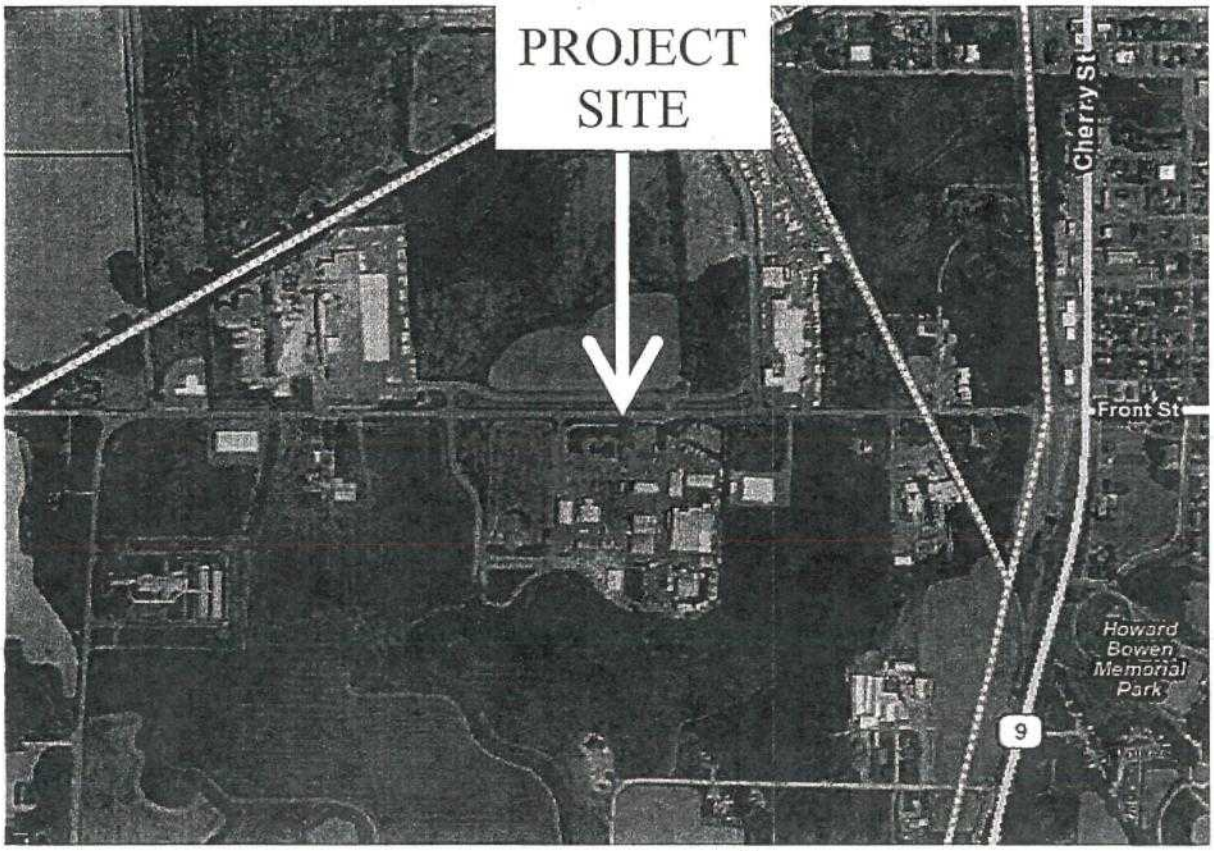


Figure 1: Vicinity Map

2.2 FACILITY SITE MAP

A Facility Site Map is provided in Figure 2.

3.0 FACILITY ASSESSMENT

3.1 FACILITY DESCRIPTION

Socco facility is located in Sumas, Washington on a 27.8 acre site and presently is the site for two companies, Socco, Inc. and Cedarprime, and an undeveloped parcel owned by Sumas Properties, LLC – see Figure 2. A cogeneration power plant, formerly part of this site, was separated and sold to Puget Sound Energy (PSE) in 2008. The site is located in Section 3, Township 40, Range 4 East, W.M. in Whatcom County.

Socco:

The 9.5 acre facility is located on a 15.1 acre site and includes outdoor lumber storage areas, a 7,800 square foot dry lumber storage building, an 9,500 square foot lumber sawing and stacking building (sticker stacker), a 7,300 square foot quonset building for covered storage, a 15,000 square foot kiln and cooling shed, an office trailer, a lunch room trailer, miscellaneous small electrical and parts storage units, and two detention ponds. The remaining 5.6 acres includes Johnson Creek, its 100 ft. conservancy buffer, and some farmland on the south side of the creek.

Sumas Properties:

Sumas Properties, LLC owns a 5.0 acre lot between Socco's west property line and Darrell Jones Way. This land is presently undeveloped farmland with the exception of a 7,000 square foot paved asphalt lumber storage area used by Socco that drains onto the Socco site.

Cedarprime:

The Cedarprime site is a wood products facility that re-manufactures cedar lumber by converting low grade cedar into high quality finished boards and exterior siding using sawing and finger jointing processes. The 7.7 acre facility includes outdoor lumber storage areas, a 4,600 square foot package kiln, a 20,500 square foot tracking kiln and cooling shed, a 42,800 square foot cedar siding manufacturing plant, a 9,100 square foot and a 7,500 square foot storage buildings, a fire pump house, a guard house, and a 17,200 square foot gravel parking lot.

3.2 PREVIOUS SITE OPERATION

The Sumas Cogeneration Company, L.P. (SCCLP) was the original owner of the 13.2 acre site on the south side of Front Street. The site began operation in 1993 with Socco, Inc. (a custom kiln drying business) leasing the northern two-thirds of the site and SCCLP operating a cogeneration power plant on the southern one-third of the site. The original 1993 site included a detention and treatment facility for managing the stormwater runoff from both sites. The stormwater facilities were designed in accordance with the Whatcom County Standards and the Washington Department of Fisheries Guidelines in place in 1991. The combined runoff was routed to a detention pond located in the southwest corner of the cogenerationsite. The detention pond discharged into a ditch that conveyed runoff north into a water quality treatment biofiltration swale located at the north end of the site near Front Street. The treated stormwater was released into a ditch on the south side of Front Street.

In 2002, the northern portion of the site was redeveloped to allow for the addition of a new kiln and lumber storage area resulting in the removal of the biofiltration swale. The SCCLP stormwater system was modified to pump the stormwater collected in the detention pond directly to the cooling tower where it was used as part of the steam cooling process. Any discharges from the cooling tower, as part of the cooling tower maintenance, were routed to the City of

Sumas sanitary sewer system. As part of this site modification, SCCLP leased the wood processing site to Cedarprime, Inc. and Socco moved most of its operation to the adjacent property west of the original site. Both the Socco and Cedarprime facilities utilize steam produced from the power production process to provide the heat for the wood drying kilns.

In 2006, the Socco site was expanded and a new combined stormwater treatment wetland and detention pond south of Front Street (Socco North Pond) was constructed to manage the stormwater runoff from Socco's site.

In 2008, Puget Sound Energy purchased the cogeneration power plant from the SCCLP (Lot A- 5.43 acres). As a condition of the sale, the stormwater conveyance systems for the SCCLP and Cedarprime facilities were separated. The existing stormwater conveyance system was modified to isolate the runoff from the SCCLP cogenerationsite and Cedarprime. Runoff from the power plant was routed to the existing detention pond. This pond was modified to provide water quality treatment and detention for the power plant site as a combined stormwater treatment wetland and detention pond in accordance with the Washington State Department of Ecology's 2005 *Stormwater Management Manual for Western Washington* (WDOE Manual). The modified pond now discharges south towards Johnson Creek releasing runoff through a dispersion trench above the Creek's 60-foot ordinary high water mark buffer.

As part of this facility separation, stormwater runoff from the Cedarprime site was routed to a pond (Socco Basin Combined Stormwater Treatment Wetland and Detention Pond) in the southwest corner of the site.

In 2010, after receiving an Army Corp of Engineers Individual Permit (NSW-2008-290-NO) to fill the wetland adjacent to the Socco North Pond, this pond was enlarged to accommodate future facility growth. The stormwater conveyance system of both the Socco and Cedarprime sites were revised such that runoff from the northern portion of both sites now flows to the Socco North Pond while runoff from the southern portion of both sites flows to the Socco South Pond. Both ponds discharge treated detained runoff into the roadside ditch on the south side of Front Street. The enlarged Socco North Pond is now capable of treating and detaining runoff from the present developed site (8.1 acres) with an additional 1.9 acres of contributing impervious surface reserve capacity. In order to meet the DOE flow control requirements for a future 10 acre basin, the control structure would have to be slightly modified – see Appendix B for additional information.

3.3 Inventory of Industrial Activities

A description of all areas associated with industrial activities that may potentially be sources of significant amounts of pollutants is provided below, as required by the General Industrial Permit.

3.3.1 Loading and Unloading of Dry Bulk Materials or Liquids

Lumber

Socco: Pre-cut green lumber is delivered to the site on open bed trucks. The truck unloading and load area is located in the center of the facility. Typical materials that are delivered or shipped offsite include lumber and associated handling products such as lath and timber supports.

Cedarprime: Dimension lumber and cedar lumber is delivered to the site on open bed trucks. The truck unloading and loading area is located at the front of the facility.

Diesel fuel, hydraulic fluids, and lubricants
Small quantities of hydraulic fluids for equipment maintenance are delivered to the site in five gallon drums. Diesel fuel and bearing lubricants are delivered to, and stored inside buildings at the Socco and Cedarprime sites. During major equipment overhauls fluids and lubricants are delivered and stored under the direction of the outside contractor providing these services.

Glue
Glue, used on some finished lumber at Cedarprime, is delivered to the site in 4'x 4'x 3' plastic containers (approximately 360 gallons). The containers are stored in the manufacturing building.

3.3.2 Outdoor Storage of Materials or Products
Green lumber, typically Douglas fir, hemlock, cedar, and assorted hardwoods, is delivered and stored outdoors until it is dried in the kilns. Depending on the customer's preference, the dried lumber can be stored outside or inside a building.

3.3.3 Outdoor Manufacturing and Processing
All lumber processing, cutting, surfacing, finishing, and sticker stacking occurs under covered areas and in buildings.

3.3.4 Dust or Particulate Generating Processes
Sawdust generation occurs as a result of the lumber sawing operation. For both Socco and Cedarprime, this operation occurs inside a building with curtain containment around the sawing equipment. The saw equipment captures the sawdust and directs it to a bag house. The bag house contains approximately 120 internal filters that eliminate airborne emissions. The bag house has a collection efficiency of 99%. This system is inspected annually by the Northwest Clean Air Agency.

3.3.5 Roofs or Other Surfaces Exposed to Air Emissions From Manufacturing Building or Process Area
As discussed in Section 3.2.4, air emissions are contained by the bag houses and their filter system. Roofs and other structures may be exposed to air emissions from the PSE power plant. While the particulates associated with this exposure are not anticipated to be appreciable, the enhanced water quality treatment as provided by the stormwater treatment wetland will treat runoff prior to an offsite discharge.

3.3.6 Onsite Waste Treatment, Storage, or Disposal
Socco: Sawdust captured in the bag house is collected in a storage bin that is emptied into a large storage trailer. The trailer is open on the top but sealed on all sides and the bottom. All precipitation that enters the trailer is stored inside and is not discharged onsite. The trailer and its contents are hauled offsite, the trailer is replaced, and the contents are disposed of offsite.

Cedarprime: Sawdust captured in the bag house is collected in an elevated storage bin that is emptied in a large truck dump building. The truck dump building is sealed on all sides and has a truck door entry in the front. The truck dump building is emptied up to two times a day by a wood waste hauling company. The building holds the wood shavings in the upper building attic and the wood waste is discharged into the truck positioned under the bin release.

Waste typically associated with a small office (paper, trash) of approximately 90 people is generated onsite and is periodically disposed of offsite by a licensed contractor.

3.3.7 Vehicle and Equipment Fueling, Maintenance and/or Cleaning

Vehicle fueling, maintenance, and cleaning are performed only on the Cedarprime site in designated areas. There are currently six forklifts located onsite. All vehicle fueling and maintenance is performed indoors. Periodic cleaning of the forklifts follows the BMP's listed in Section 5.1.2 for Washing and Steam Cleaning Vehicles/Equipment/Building Structures.

Equipment maintenance is occasionally performed at the Socco site by outside contractors. Each contractor is responsible for providing their own spill prevention, clean up, and disposal of materials used.

3.3.8 Roofs or Other Surfaces Composed of Materials that May be Mobilized by Stormwater

All roofs onsite are painted metal and do not contain materials known to leach and/or emit emissions that may be mobilized by stormwater runoff.

3.4 Inventory of Materials

The Industrial Permit requires a general inventory of the materials handled at this site and exposed to precipitation or runoff. For each material at the subject property with the potential to result in a significant amount of stormwater pollution, an evaluation has been conducted to determine the potential for these materials to contribute pollutants to runoff being discharged from the site. A summary of all potential pollutants is outlined below.

3.4.1 Socco

Lumber Storage

Description:	Green lumber, typically Douglas fir, hemlock, cedar, and assorted hardwoods, is delivered and stored outdoors until it is dried in the kilns. Depending on the customer's preference, the dried lumber can be stored outside or inside a building. Approximately 80% of the lumber stored is green, with the remaining 20% dry lumber.
Quantity:	While storage quantities vary depending on customer demands, approximately 2.6 MBF (million board feet) or 217,000 cubic feet of lumber is an average onsite storage volume.
Storage:	Green lumber is typically stored outside. Dried lumber is stored in the Dry Lumber Storage Building or outside, depending on the customer's preference.
Exposure:	Lumber stored outdoors does come into contact with precipitation.
Risk:	This material is not likely to contribute significant amounts of pollutants to stormwater runoff because it is inert, free of chemicals and non-erosive.

Hydraulic Fluid

Description:	Hydraulic fluid for equipment operation
Quantity:	Approximately four five-gallon containers are kept onsite.
Storage:	The containers are stored inside the Sticker Stacker Building on a spill prevention platform.

Exposure: None. Material is stored inside a covered building.

Risk: Minimal. Material is not exposed to stormwater. Small localized spills, if any, are cleaned up immediately before contact with outside elements.

3.4.2 CEDARPRIME

Lumber Storage

Description: Cedar and dimension lumber is delivered and stored outdoors until it is dried in the kilns. Depending on the customer's preference, the dried lumber can be stored outside or inside a building. Approximately 50% of the lumber stored is green, with the remaining 50% dry lumber.

Quantity: While storage quantities vary depending on customer demands, approximately 2 million board feet or 167,000 cubic feet of lumber is an average onsite storage volume.

Storage: The dried lumber is stored in the dry lumber storage building or outside, depending on the customer's preference.

Exposure: Lumber stored outdoors does come into contact with precipitation.

Risk: This material is not likely to contribute significant amounts of pollutants to stormwater runoff because it is inert, free of chemicals and non-erosive.

Diesel fuel, hydraulic fluids, and lubricants

Description: Hydraulic fluid for equipment operation.

Quantity: Approximately four five-gallon containers are kept onsite.

Storage: The containers are stored inside a dry lumber storage building on a spill prevention platform.

Exposure: None. Material is store inside a covered building.

Risk: Minimal. This material is stored inside a building and is not likely to contaminate stormwater runoff. Small localized spills, if any, are cleaned up immediately before contact with outside elements.

Glue

Description: Glue is used in the cedar siding operation.

Quantity: Approximately three 4'x 4'x 3' plastic containers (approximately 360 gallons) are kept onsite.

Storage: The containers are stored inside a dry lumber storage building on a spill prevention platform.

Exposure: None. Material is store inside a covered building.

Risk: Minimal. This material is stored inside a building and is not likely to contaminate stormwater runoff. Small localized spills, if any, are cleaned up immediately before contact with outside elements. In the event of a large spill, the glue that enters the stormwater system will become a solid upon contact with water.

4.0 Pollution Prevention Team

Responsible Official: Gary Jones	**Title:** General Manager **Office Phone:** (360) 988-4900 **Fax:** (360) 988-0407	**Cell:** (360) 927-4010
Responsibilities: Signatory authority, spill response coordinator, oversee inspections		
Team Leader: Gene Keller	**Title:** Maintenance and Operations Supervisor, Safety Coordinator **Office Phone:** (360) 988-4900 **Fax:** (360) 988-0407	**Home:** (360) 733-1568 **Cell:** (360) 220-5131
Responsibilities: Oversee good housekeeping, implementation of SWPPP, conduct inspections, training		

The team will hold quarterly meetings to review the overall operation of BMPs. All team members will receive training, at least annually, on the operation, maintenance and inspections of BMPs and on reporting procedures.

5.0 BEST MANAGEMENT PRACTICES (BMPs)

BMPs were selected from the 2005 Washington State Department of Ecology's *Stormwater Management Manual for Western Washington* (DOE Manual). BMPs will be implemented and maintained appropriately to reduce the potential for discharge of significant amounts of pollutants from the subject property. In the event that updated versions of the DOE Manual are published while this SWPPP is in effect, the facility shall apply the technical standards and BMPs found in the most current version of the DOE Manual at all times. Applicable sections of the DOE Manual are provided in Appendix C.

5.1 OPERATIONAL *SOURCE CONTROL BMPS*

5.1.1 Operational Source Control BMPs Used Onsite

Operational Source Control BMPs are non-structural practices that prevent or reduce pollutants from entering stormwater. Examples include formation of a pollution prevention team, good housekeeping practices, preventive maintenance procedures, spill prevention and cleanup, employee training, inspections of pollutant sources, and record keeping. They can also include process changes, raw material/product changes, and recycling wastes. Operational Source Control BMPs are considered the most cost-effective pollutant minimization practices.

Applicable operational source control BMPs are taken from the DOE Manual. BMPs will be installed and maintained according to the DOE Manual. An outline of implemented BMPs is provided below.

5.1.2 Good Housekeeping

Good housekeeping procedures consist of regular inspection of onsite areas exposed to precipitation or stormwater runoff, as well as cleaning and clearing of any accumulation of debris, fluids, or contaminants that could contribute pollutants to stormwater.

MANDATORY REQUIREMENTS

- **Vacuum paved surfaces with a vacuum sweeper (or a sweeper with a vacuum attachment) to remove accumulated pollutants a minimum of once per quarter.**
- **Identify and control all onsite sources of dust to minimize stormwater contamination from the deposition of dust on areas exposed to precipitation.**
- **Inspect and maintain bag houses monthly to prevent the escape of dust from the system. Immediately remove any accumulated dust at the base of exterior bag houses.**
- **Keep all dumpsters under cover or fit with a lid that must remain closed when not in use.**

Recommended good housekeeping practices include the following:

- Promptly contain and clean up solid and liquid pollutant leaks and spills including oils, solvents, fuels, and dust from manufacturing operations on any exposed soil, vegetation, or paved area.

- Sweep paved material handling and storage areas regularly as needed, for the collection and disposal of dust and debris that could contaminate stormwater. Do not hose down pollutants from any area to the ground, storm drain, conveyance ditch, or receiving water unless necessary for dust control purposes to meet air quality regulations and unless the pollutants are conveyed to a treatment system approved by the local jurisdiction.
- Clean oils, debris, sludge, etc. from all BMP systems regularly, including catch basins, settling/detention basins, oil/water separators, boomed areas, and conveyance systems, to prevent the contamination of stormwater.
- Promptly repair or replace all substantially cracked or otherwise damaged paved secondary containment, high-intensity parking and any other drainage areas, which are subjected to pollutant material leaks or spills.
- Promptly repair or replace all leaking connections, pipes, hoses, valves, etc. which can contaminate stormwater.

The following are recommended additional good housekeeping BMPs:

- Regularly inspect the berm and side slopes of the detention ponds and ditches for poor vegetation ground cover and exposed soils. Provide additional seeding and/or mulching as required to reduce potential for soil erosion.
- Clean up pollutant liquid leaks and spills in impervious uncovered containment areas at the end of each working day.
- Use solid absorbents, e.g., clay and peat absorbents and rags for cleanup of liquid spills/leaks, where practicable.
- Recycle materials, such as oils, solvents, and wood waste, to the maximum extent practicable.

The following BMPs have been identified as good housekeeping practices that apply to the site.

<u>BMPs for Parking and Storage of Vehicles and Equipment</u>

Public and commercial parking lots can be sources of toxic hydrocarbons and other organic compounds, oils and greases, metals, and suspended solids caused by the parked vehicles. Some preventative BMPs include:

- Inspect parking lot for contaminants, and clean as required, prior to hosing down the area to a storm drain or to a receiving water. Sweep parking lots, storage areas, and driveways, regularly to collect dirt, waste, and debris.

<u>BMPs for Washing and Steam Cleaning Vehicles/Equipment/Building Structures</u>

Vehicles, industrial equipment, and large buildings may be commercially cleaned with low or high pressure water or steam. The cleaning can include hand washing, scrubbing, sanding, etc. Wash water from cleaning activities can contain oil and grease, suspended solids, heavy metals, soluble organics, soaps, and detergents that can contaminate stormwater. Conduct washing operations in a designated wash area with the following features:

- In a building constructed specifically for washing of vehicles and equipment, which drains to a sanitary sewer.
- If washing is conducted outside, use a paved area, constructed as a spill containment pad to prevent the run-on of stormwater from adjacent areas. Slope the spill containment area

so that wash water is collected in a containment pad drain system with perimeter drains, trench drains, or catchment drains. Size the containment pad to extend out a minimum of four feet on all side of the vehicles and/or equipment being washed.

- Convey the wash water to a sump (like a grit separator) and then to a sanitary sewer (if allowed by the local Sewer Authority), or other appropriate wastewater treatment or recycle system. An NPDES permit may be required for any wash water discharge to a storm drain or receiving water after treatment. Contact the DOE regional office for NPDES Permit requirements.
- Collect the wash water from building structures and convey it to appropriate treatment such as a sanitary sewer system if it contains oils, soaps or detergents, where feasible. If the wash water does not contain oils, soaps, or detergents then it could drain to soils that have sufficient natural attenuation capacity for dust and sediment.
- Use phosphate-free biodegradable detergents when practicable.
- Consider recycling the wash water.
- Because soluble/emulsifiable detergents can be used in the wash medium, the selection of soaps and detergents and treatment BMPs should be considered carefully. Oil/water separators are ineffective in removing emulsified or water soluble detergents.

Copies of the following DOE Manual identified BMPs are provided in Appendix C:

- BMP C120: Temporary and Permanent Seeding
- BMP C121: Mulching
- BMPs for Dust Control at Manufacturing Areas
- BMP C140: Dust Control
- BMPs for Loading and Unloading Areas for Liquid or Solid Material
- BMPs for Storage or Transfer (Outside) of Solid Raw Materials, or Finished Products

5.1.3 Preventative Maintenance

Preventative maintenance procedures consist of regular inspection of the facility and equipment for debris, spills, and leaks, as well as unprotected sources of potential pollutants.

The following preventative maintenance measures shall be taken:

- Inspect all equipment and vehicles during monthly site inspections for leaking fluids such as oil, antifreeze, etc. Take leaking equipment and vehicles out of service or prevent leaks from spilling on the ground until repaired. Materials loading/unloading and transfer areas are regularly inspected for leaks in the piping, pumping, or storage systems.
- Clean catch basins when the depth of debris reaches 60% of the sump depth. In addition, the debris surface must be kept at least 6 inches below the outlet pipe.
- Provide maintenance to all stormwater system components in accordance with the guidelines outlined in the DOE *Maintenance Standards for Drainage Facilities.* See Appendix C for a copy of the following maintenance standards:
    - Detention Ponds
    - Control Structure/Flow Restrictor
    - Catch Basins

- Energy Dissipaters
- Filter Strips
- Wetponds
- Catch Basin Inserts

BMPs for Maintenance and Repair of Vehicles and Equipment

Pollutant sources include parts/vehicle cleaning, spills/leaks of fuel and other liquids, replacement of liquids, outdoor storage of batteries/liquids/parts, and vehicle parking. Some preventative BMPs include:

- Inspect for leaks all incoming vehicles, parts, and equipment stored temporarily outside.
- Use drip pans or containers under parts or vehicles that drip or are likely to drip liquids, such as during dismantling of liquid containing parts or removal or transfer of liquids.
- Empty oil and fuel filters before disposal. Provide for proper disposal of waste oil and fuel.
- Do not pour/convey washwater, liquid waste, or other pollutant into storm drains or to surface water. Check with the local sanitary sewer authority for approval to convey to a sanitary sewer.
- Do not connect maintenance and repair shop floor drains to storm drains or to surface water. To allow for snowmelt during the winter a drainage trench with a sump for particulate collection can be installed and used only for draining the snowmelt and not for discharging any vehicular or shop pollutants.
- Conduct all maintenance and repair of vehicles and equipment in a building, or other covered impervious containment area that is sloped to prevent run-on of uncontaminated stormwater and runoff of contaminated stormwater.

BMPs for Maintenance of Stormwater Drainage and Treatment Systems

Regular maintenance of stormwater treatment facilities is necessary to ensure their proper operation. Maintenance requirements include:

- Inspect and clean treatment BMPs, conveyance systems, and catch basins as needed, and determine whether improvements in O & M are needed.
- Promptly repair any deterioration threatening the structural integrity of the facilities. These include replacement of clean-out gates, catch basin lids, and rock in emergency spillways.
- Ensure that stormwater capacities are not exceeded and that heavy sediment discharges to the storm system are prevented.
- Regularly remove debris and sludge from BMPs used for peak-rate control, treatment, etc. and dispose of appropriately according to the nature of the debris.
- Clean catch basins when the depth of deposits reaches 60 percent of the sump depth as measured from the bottom of basin to the invert of the lowest pipe into or out of the basin. However, in no case should there be less than six inches clearance from the debris surface to the invert of the lowest pipe.
- Provide annual inspections or stormwater structures as described in the DOE Manual's *Maintenance Standards for Drainage Facilities*, a copy of which is provided in Appendix C.

BMPs for Landscaping and Lawn/Vegetation Management

Landscaping can include grading, soil transfer, vegetation removal, pesticide and fertilizer applications, and watering. Stormwater contaminants include toxic organic compounds, heavy materials, oils, total suspended solids, coliform bacteria, fertilizers, and pesticides.

Lawn and vegetation management can include control of objectionable weeds, insects, mold, bacteria and other pests with chemical pesticides and is conducted commercially at commercial and industrial areas. Poor management of the vegetation and poor application of pesticides or fertilizers can cause appreciable stormwater contamination. Some preventative BMPs include:

- Install engineered soil/landscape systems to improve the infiltration and regulation of stormwater in landscaped areas.
- Do not dispose of collected vegetation into waterways or storm drainage systems.
- Conduct mulch-mowing whenever practicable.
- Dispose of grass clippings, leaves, sticks, or other collected vegetation by composting, if feasible.
- Use mulch or other erosion control measures when soils are exposed for more than one week during the dry season or two days during the rainy season.
- Till fertilizers into the soil rather than dumping or broadcasting onto the surface. Determine the proper fertilizer application for the types of soil and vegetation encountered.
- Till a topsoil mix or composted organic material into the soil to create a well-mixed transition layer that encourages deeper root systems and drought-resistant plants.
- Use manual and/or mechanical methods of vegetation removal rather than applying herbicides, where practical.
- Choose the least toxic pesticide available that is capable of reducing the infestation to acceptable levels. The pesticide should readily degrade in the environment and/or have properties that strongly bind to the soil.
- Do not spray pesticides within 100 feet of open waters including wetlands, pond, stream, sloughs and any drainage ditch or channel that leads to open water except when approved by Ecology or the local jurisdiction. All sensitive area including wells, creeks and wetlands must be flagged prior to spraying.
- Consider alternatives to the use of pesticides such as covering or harvesting weeds, substitute vegetative growth and manual weed control/moss removal.

5.1.4 Spill Prevention and Emergency Clean Up Plan

The necessary items for rapid cleanup of potential and anticipated spills are kept in appropriate locations throughout the site. These items may include absorbent materials and granules to absorb spilled materials. An *Emergency Spill Response Plan* has been developed and is included in Appendix E. Any debris or refuse materials resulting from preventative maintenance or clean-up activities will be disposed of in an appropriate manner and will not be allowed to contact stormwater.

Procedures necessary for notification, cleaning up spills, and preventing the spilled materials from being discharged from the site are outlined in the *Emergency Spill Response Plan.*

Generally, in the event of a spill at least one member of the pollution prevention team shall be notified and immediate and safe action taken to stop, contain, and clean up any discharge that might cause an adverse impact to waters of the state. Contaminated materials and soils shall be safely and carefully removed to areas that are not subject to precipitation or runoff and treated according to the applicable Federal or State regulation or manufacturer's recommendations for the specific chemical or petroleum product involved.

5.1.5 Employee Training

A formal training session will be conducted by the SWPPP Team for all personnel who have duties that may be affected by the provisions of the General Permit. Training will be conducted annually, unless conditions or personnel changes indicate that more frequent training is necessary. The affected employees will be made aware of the purpose and contents of the SWPPP. The training sessions will include information regarding preventive maintenance procedures, good housekeeping practices, inspections, material management, and actions to prevent and respond to accidental spills at the property. Training records are maintained onsite by the Human Resources/Safety Coordinator. A training log is included in Appendix F of this SWPPP and will be updated annually.

5.1.6 Inspections and Record Keeping

See Section 7, *Inspections* and Section 9, *Reporting and Record Keeping* for this information.

5.1.7 Illicit Discharges

Illicit discharges are unpermitted wastewater discharges to storm drains, groundwater, or surface water. To ensure the site does not have any illicit discharges, the following BMPs will be implemented:

- Annually conduct a field survey of buildings and other support areas to locate storm drains from buildings and paved surfaces. Note where runoff from these areas joins the storm drain(s) and pipe system.
- During non-stormwater conditions (at times other than during or immediately after storm events) inspect each storm drain for non-stormwater discharges. Record the locations of all non-stormwater discharges including any permitted discharges.
- If possible cross connections exist between process and stormwater systems, smoke, dye or chemical analysis tests can be used to detect connections between the two systems.
- Compare the observed locations of connections with the information onsite maps and revise accordingly. Note suspect connections that are inconsistent with the field survey.
- If any cross sections are found, make the necessary repair actions to separate the process water or other illicit discharges from the stormwater system.

5.2 STRUCTURAL *SOURCE CONTROL BMPs*

Structural Source Control BMPs are physical, structural, or mechanical devices or facilities that are intended to prevent pollutants from entering stormwater. Examples of Structural Source Control BMPs typically include:

- Enclosing and/or covering the pollutant source (e.g. within a building or other enclosure, a roof over storage and working areas, temporary tarp, etc.).

- Physically segregating the pollutant source to prevent run-on of uncontaminated stormwater.
- Devices that direct only contaminated stormwater to appropriate treatment BMPs (e.g., discharge to a sanitary sewer if allowed by the local sewer authority).

Applicable structural source control BMPs are taken from the DOE Manual. BMPs will be installed and maintained according to the DOE Manual. An outline of implemented BMPs is provided below.

5.2.1 BMPs to Minimize Exposure

BMPs for Dust Control at Manufacturing Areas

Industrial material handling activities can generate considerable amounts of dust that is typically removed using exhaust systems. Particulate material that are of concern to air pollution control agencies include sawdust, gravel, and crushed rock. Corrective measures include preventing dust generation and emissions where feasible, regular clean-up of dust and particulates that can contaminate stormwater, and conveying dust contaminated stormwater to proper treatment. Clean, as needed, sawdust handling and generating equipment, regularly sweep dust accumulation areas that can contaminate stormwater, and train employees to minimize contamination of stormwater. Some preventative BMPs include:

- Regularly sweep using vacuum filter equipment to minimize dust generation and to ensure optimal dust removal.
- Use dust filtration/collection systems such as bag house filters, cyclone separators, etc. to control vented dust emissions that could contaminate stormwater.
- Presently at Socco: Curtains are installed around the baghouse receiving bin to prevent sawdust from blowing onto the rest of the site. Sawdust is vacuumed or swept after operation of the resaw.

BMPs for Storage or Transfer (Outside) of Solid Raw Materials, By-Products, or Finished Products

Solid raw materials, by-products, or products such as gravel, topsoil, logs, sawdust, wood chips, lumber and other building materials, concrete, and metal products sometimes are typically stored outside in large piles, stacks, etc. Contact of outside bulk materials with stormwater can cause leachate, and erosion of the stored materials. Contaminants include TSS, BOD, organics, and dissolved salts (sodium, calcium, and magnesium chloride, etc). Provide impervious containment with berms, dikes, etc. and/or cover to prevent run-on and discharge of leachate pollutant(s) and TSS. Do not hose down the contained stockpile area to a storm drain or a conveyance to a storm drain or to a receiving water.

Stockpiles greater than 5 cubic yards of erodible or water soluble materials such as soil, unwashed sand and gravel, and sawdust, and outside storage areas for solid materials such as lumber shall utilize one or more of the following BMPs:

- Store in a building or paved and bermed covered area.
- Place temporary plastic sheeting (polyethylene, polypropylene hypalon, or equivalent) over the stockpile material.

- Pave the area and install a stormwater drainage system. Place curbs or berms along the perimeter of the area to prevent the run-on of uncontaminated stormwater and to collect and convey runoff to treatment.
- Slope the paved area in a manner that minimizes the contact between stormwater (e.g., pooling) and leachable materials in wood chips and saw dust.
- For large stockpiles that cannot be covered, implement containment practices at the perimeter of the site and at any catch basins as needed to prevent erosion and discharge of the stockpiled material offsite or to a storm drain.
- Ensure that contaminated stormwater is not discharged directly to catch basins without conveying through a treatment BMP.
- Convey contaminated stormwater from the stockpile area to the stormwater treatment wetland and detention pond or other appropriate treatment system depending on the contamination.
- Maintain drainage areas in and around storage of solid materials with a minimum slope of 1.5 percent to prevent pooling and minimize leachate formation.
- Sweep paved storage areas regularly for collection and disposal of loose solid materials.
- Stock cleanup materials, such as brooms, dustpans, and vacuum sweepers near the storage area.

BMPs for Loading and Unloading Areas for Liquid or Solid Material

Loading/unloading of liquid and solid materials is typically conducted at shipping and receiving, outside storage, fueling areas etc. Leaks and spill of fuels, oils, powders, organics, heavy metals, salts, acids, alkalis, etc. during transfer are potential causes of stormwater contamination. Some preventative BMPs include:

- Place drip pans, or other appropriate temporary containment device, at location where leaks or spills may occur such as hose connections, hose reels and filler nozzles. Drip pans will always be used when making and breaking connections. Check loading/ unloading equipment such as valves, pumps, flanges, and connections regularly for leaks and repair as needed.
- Consistent with Uniform Fire Code requirements and to the extent practicable, conduct unloading or loading of solids and liquids in a building, under a roof, or lean-to, or other appropriate cover.
- Berm, dike, and/or slope the loading/unloading area to prevent run-on of stormwater and to prevent the runoff or loss of any spilled material from the area.

5.2.2 Treatment BMPs

Stormwater runoff is treated in various ways on the project site. See Figure 2 for the location of the following facilities.

Catch Basins and Catch Basin Inserts

At the bottom of each catch basin is a sump that collects large sediment particles and debris captured below the discharge pipe. Catch basins are periodically inspected and the cleaned when the depth of debris reaches 60% of the sump depth. In addition, the debris surface must be kept at least 6 inches below the outlet pipe. Some catch basins contain inserts that are installed under

the rim of the catch basin. These inserts also capture debris that would normally enter the pipe conveyance system.

These treatment facilities shall be inspected monthly and maintained on an as needed basis/ annually at a minimum. Maintenance of the facilities shall be performed in accordance with the DOE Manual *Maintenance Standards for Drainage Facilities; No. 5- Catch Basins* and *No. 18 – Catch Basin Inserts*, copies of which are provided in Appendix C.

Stormwater Treatment Wetlands

Since this is an industrial site, the WDOE Manual requires "enhanced" treatment of stormwater runoff. Stormwater treatment wetlands, designed and constructed in accordance with BMP T10.30 *Stormwater Treatment Wetland,* are used to provide enhanced treatment for runoff from the North, South, and Parking Lot basins. The North and South basins each have a Combined Stormwater Treatment Wetland and Detention Pond that provides water quality treatment and flow control (detention). The Parking Lot Basin, which does not require detention, has only the stormwater treatment wetland. In the larger North and South Basins, the treatment wetlands, located in the bottom (dead storage area) of the detention pond, have a pre-settling cell where stormwater runoff enters the wetland. This cell settles out the majority of the sediment before sending the stormwater into the wetland area. The pre-settling cell is sized to approximately one-third of the required volume, with remaining volume in the second wetland cell. The smaller Parking Lot Basin has a single cell stormwater treatment wetland. The design drawings for these facilities are provided in Appendix B.

These treatment facilities shall be inspected and maintained annually, at a minimum. Maintenance of the facilities shall be performed in accordance with the DOE Manual *Maintenance Standards for Drainage Facilities; No. 11 Wetponds*, a copy of which is provided in Appendix C.

Vegetated Filter Strip

Runoff from the access road off of Darrell Jones Way sheet flows through a Compost Amended Filter Strip on the north side of the access road. This filter strip, designed in accordance with BMP T9.40 *Basic Filter Strip & Compost-Amended Filter Strip,* provides water quality treatment for the runoff from this limited area prior to its entering the associated detention pond. The filter strip and associated detention pond design drawing is provided in Appendix B.

These treatment facilities shall be inspected and maintained annually, at a minimum. Maintenance of the facilities shall be performed in accordance with the DOE Manual *Maintenance Standards for Drainage Facilities; No. 10 – Filter Strips*, a copy of which is provided in Appendix C.

5.2.3 Stormwater Peak Runoff Rate and Volume Control BMPs

Detention Ponds

The site contains three stormwater detention ponds (North Basin, South Basin, and Access Road) that are utilized to reduce the peak runoff rate for stormwater leaving the site. The locations of these ponds are shown in Figures 2. The design drawings, which show the required pond

configurations and dimensions, are provided in Appendix B. These ponds shall be inspected and maintained annually to insure the pond configurations match the design requirements. Annual maintenance shall be in accordance with the DOE Manual *Maintenance Standard for Drainage Facilities; No. 1- Detention Ponds, No. 4 – Control Structure*, and No. 7 – Energy Dissipaters (for overflow weirs), copies of which are provided in Appendix C.

5.2.4 Erosion and Sediment Control BMPs

To minimize problems associated with soil erosion, the site will be routinely inspected for evidence of existing or potential soil erosion. If evidence of erosion or the potential for erosion is discovered soils in the area shall be stabilized. Methods for stabilizing the soil may include those outlined in Ecology's Stormwater Management Manual or other controls applicable to the unique conditions of the area.

6.0 SAMPLING PLAN

6.1 SAMPLING LOCATIONS

Stormwater runoff has the potential to leave the site at three locations where it can eventually reach Johnson Creek. Figure 2 identifies the location of these discharge points, as wells as the location of the site's water quality treatment facilities (stormwater treatment wetlands and compost amended filter strip) and flow control facilities (detention ponds).

The three offsite discharge locations are:

1. The ditch on the south side of Front Street approximately half way between Darrel Jones Way and the Socco entrance. (Discharge from the North Detention Pond)
2. The ditch on the south side of Front Street at the northwest property corner. (Discharge from the South Detention Pond)
3. The ditch on the south side of Front Street at the northeast property corner. (Discharge from the Parking Lot Detention Pond)

Note: The runoff from Socco's entrance road coming off Darrell Jones Way is routed though a filter strip and detention pond north of the road. Runoff from this pond is routed to the field north of the pond where it infiltrates, evaporates, or is consumed by the plants in the field. Based on the site topography, runoff does not reach the Front Street ditch, nor travel offsite.

6.2 STAFF RESPONSIBILITIES

Stormwater sampling and visual inspections will be conducted by the Pollution Prevention Team listed in Section 4.0.

6.3 SAMPLING TIMING AND FREQUENCY

(Permit Section S4.B, page 21)

A. Each discharge location shall be sampled at least once per quarter:

First Quarter = January, February, March
Second Quarter = April, May, and June
Third Quarter = July, August, and September
Fourth Quarter = October, November, and December

B. Samples shall be taken at each discharge location from the first fall storm event each year. "First fall storm event" means the first time after October 1st of each year that precipitation occurs and stormwater actually leaves the site.

C. Samples shall be collected within the first 12 hours of stormwater discharge events. If it is not possible to collect a sample within the first 12 hours of a stormwater discharge event, the sample must be collected as soon as practicable after the first 12 hours. Documentation explaining why the sample could not be collected within the first 12 hours must be kept with the sampling records.

D. A representative samples, which may be a single grab sample, a time-proportional sample, or a flow-proportional sample, shall be obtained.

E. Sampling need not be taken outside of regular business hours or during unsafe conditions.

F. When there is no discharge at a designated sampling point and taking a sample is not possible, a Discharge Monitoring Report (DMR), stating this condition, must still be submitted for the reporting period.

6.4 BENCHMARKS, EFFLUENT LIMITATIONS AND SPECIFIC SAMPLING REQUIREMENTS (Permit Section S.5, page 25)

Stormwater samples shall be tested for the following parameters:

TABLE 6.4: Benchmarks and Sampling Requirements Applicable to All Facilities

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level [a]	Minimum Sampling Frequency [b]
Turbidity	NTU	25	EPA 180.1 Meter	0.5	1/quarter
pH	Standard Units	Between 5.0 and 9.0	Meter/Paper [c]	±0.5	1/quarter
Oil Sheen	Yes/No	No Visible Oil Sheen	N/A	N/A	1/quarter
Copper, Total	µg/L	Western WA: 14 Eastern WA: 32	EPA 200.8	2.0	1/quarter
Zinc, Total	µg/L	117	EPA 200.8	2.5	1/quarter

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level [a]	Minimum Sampling Frequency [b]
5. Timber Product Industry (24xx), Paper and Allied Products (26xx)					
COD	mg/L	120	SM5220-D	10	1/quarter
TSS	mg/L	100	SM2540-D	5	1/quarter

[a] The Permittee shall ensure laboratory results comply with the *quantitation level* specified in the table. However, if a Permittee knows that an alternate, less sensitive method (higher detection level and *quantitation level*) from *40 CFR* Part 136 is sufficient to produce measurable results in their effluent, that method may be used for analysis.

[b] 1/quarter means 1 sample taken each quarter, year-round.

6.5 SAMPLING PROCEDURE

Stormwater sampling shall be conducted in accordance with the DOE publication, *How to do Stormwater Sampling, A guide for industrial facilities*, December 2002 (revision March 2010) or most current edition – see Appendix D. Since samples will typically be grab samples, a copy of the DOE publication, *Standard Operating Procedure for Collecting Grab Samples for Stormwater Discharges*, version 1.0, September 16, 2009, is also provided in Appendix D.

6.6 Sampling Documentation

The DOE has provided Socco with their own Discharge Monitoring Report (DMR) that shall be used to document the results of the sampling process.

A copy of the DMR form is provided in Appendix G. Socco's stormwater sampling and compliance representative shall ensure that the following information is included on the DMR form.

A. Socco Staff

The following information shall be recorded for each sample and retained onsite for DOE review:

- Sample date.
- Sample time.
- A notation describing if the sample was collected within the first 30 minutes of stormwater discharge events.
- If a sample was not collected within the first 30 minutes of a stormwater discharge event, explain why it could not be collected.
- Sample location (using SWPPP identifying number).
- Method of sampling, and method of sample preservation, if applicable.
- Individual who performed the sampling.

B. Laboratory Staff

Analytical data required by the DOE shall be provided by a laboratory registered or accredited under the provisions of, *Accreditation of Environmental Laboratories*, Chapter 173-50 WAC. Turbidity and pH are exempt from this requirement, unless the laboratory must be registered or accredited for any other parameter.

The following data shall be reported by the testing laboratory for each sample and retained onsite for DOE review:

- Date of analysis.
- Parameter name.
- CAS number, if applicable.
- Analytical method(s).
- Individual who performed the analysis.
- Method detection limit (MDL).
- Laboratory quantitation level (QL) achieved by the laboratory.
- Reporting units.
- Sample result.
- Quality assurance/quality control data.

6.7 Suspension of Sampling

(Permit Section S4.B.6, page 23)

Sampling for one or more parameters (other than "visible oil sheen") may be suspended based on consistent attainment of benchmark values when:

A. Four consecutive quarterly samples, collected after the effective date of this permit, that demonstrate a reported value equal to or less than the benchmark value; or for pH, within the range of 5.0 – 9.0.

B. For purposes of tallying "consecutive quarterly samples":
   - Do not include any quarters in which a sample was not collected, but should have (e.g., discharge(s) occurred during normal working hours, and during safe conditions; but no sample was collected during the entire quarter). If this occurs, the tally of consecutive quarterly samples is reset to zero.
   - Do not include any quarters in which a sample was not collected because there was no discharge during the quarter (or the discharges during the quarter occurred outside normal working hours or during unsafe conditions). These quarters are not included in the calculation of four consecutive quarters, but do not cause the tally to be reset; i.e., they are skipped over.

C. When sampling more than once per quarter, the average value of the samples for each parameter (except pH and "visible oil sheen") shall be compared to the benchmark value.

D. When there has been a significant process change in the contributing area of a sampling point, the previous sampling results shall not be used to demonstrate consistent attainment.

7.0 INSPECTIONS

7.1 VISUAL INSPECTIONS

Visual inspections of the stormwater facilities and BMPs shall be conducted and documented each month. A copy of the monthly inspection form is provided in Appendix G. The inspections shall be completed by qualified personnel, typically a member of the stormwater management team familiar with the operation and maintenance of site's stormwater facilities and the associated BMPs.

Each inspection shall include:

1. Observations of the site conditions at stormwater sampling locations (areas where stormwater is discharged offsite).
2. Observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharge(s).
3. Observations for the presence of illicit discharges such as domestic wastewater or process wastewater (including leachate).
    a. If an illicit discharge is discovered, the DOE shall be notified within seven days.
    b. The illicit discharge shall be eliminated within 30 days.
4. A verification that the descriptions of potential pollutant sources required under this permit are accurate.
5. A verification that the site map in the SWPPP reflects current conditions.
6. An assessment of all BMPs that have been implemented, noting all of the following:
    a. Effectiveness of BMPs inspected.
    b. Locations of BMPs that need maintenance.
    c. Reason maintenance is needed and a schedule for maintenance.
    d. Locations where additional or different BMPs are needed and the rationale for the additional or different BMPs.

7.2 INSPECTION RESULTS

The results of the monthly inspections shall be recorded in an inspection report with these records kept onsite and available for Ecology review. The inspection report document shall record the observations, verifications and assessments outlined in Section 7.1 above. This information shall include:

a. Time and date of the inspection.
b. Locations inspected.
c. Statements that, in the judgment of: 1) the person conducting the site inspection; and, 2) the person described in Condition G2.A of the DOE *Industrial Stormwater General Permit*, the site is either in compliance or out of compliance with the terms and conditions of the SWPPP and this permit.
d. If the site inspection indicates that the site is out of compliance, a summary report and a schedule of implementation of the remedial actions shall be prepared. The remedial actions taken must meet the requirements of the SWPPP and the permit.

e. Name, title, and signature of the person conducting site inspection; and the following statement: "I certify that this report is true, accurate, and complete, to the best of my knowledge and belief."

f. Certification and signature of the person described in Condition G2.A of the DOE *Industrial Stormwater General Permit*, or a duly authorized representative of the facility, in accordance with Condition G.2.B.

7.3 Reports of Non-Compliance

In the event that a site inspection reveals that site conditions are not in compliance with the terms and conditions of the permit, a report of non-compliance shall be prepared in accordance with the requirements of Section 8 of this Plan.

8.0 CORRECTIVE ACTIONS

8.1 LEVEL ONE CORRECTIVE ACTIONS – OPERATIONAL SOURCE CONTROL BMPS

In the event that sampling results exceed any applicable benchmark value(s) in Table 6.4: *Benchmarks and Sampling Requirements Applicable to All Facilities*, a Level 1 Corrective Action shall be completed for each parameter exceeded in accordance with the following:

1. Review the SWPPP and ensure that it fully complies with DOE *Industrial Stormwater General Permit*, Condition S3, and contains the correct BMPs from the applicable Stormwater Management Manual.
2. Make appropriate revisions to the SWPPP to include additional Operational Source Control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges. The revised SWPPP shall be signed and certified in accordance with DOE *Industrial Stormwater General Permit*, S3.A.6.
3. Summarize the Level 1 Corrective Actions in the Annual Report – see Section 9.2.
4. **Level One Deadline:** The revised SWPPP shall be fully implemented as soon as possible, but no later than the DMR due date for the quarter the benchmark was exceeded.

8.2 LEVEL TWO CORRECTIVE ACTIONS – STRUCTURAL SOURCE CONTROL BMPS

In the event an applicable benchmark value (for a single parameter) is exceeded for any two quarters during a calendar year, a Level 2 Corrective Action shall be completed in accordance with the following:

1. Review the SWPPP and ensure that it fully complies with DOE *Industrial Stormwater General Permit*, Condition S3.
2. Make appropriate revisions to the SWPPP to include additional Structural Source Control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges. The revised SWPPP shall be signed and certified in accordance with DOE *Industrial Stormwater General Permit*, Condition S3.A.6.
3. Summarize the Level 2 Corrective Actions (planned or taken) in the Annual Report – see Section 9.2.
4. **Level 2 Deadline:** The revised SWPPP shall be fully implemented as soon as possible, but no later than September 30th the following year.
    a. If installation of necessary Structural Source Control BMPs is not feasible by September 30th the following year, Ecology may approve additional time, by approving a Modification of Permit Coverage.
    b. If installation of Structural Source Control BMPs is not feasible or not necessary to prevent discharges that may cause or contribute to a violation of a water quality standard, Ecology may waive the requirement for additional Structural Source Control BMPs by approving a Modification of Permit Coverage.
    c. To request a time extension or waiver, a detailed explanation (including the technical bases) of why the extension or waiver is requested and a Modification of Coverage form shall be submitted to Ecology in accordance with DOE *Industrial Stormwater General Permit*, Condition S2.B, by June 1st prior to the Level 2 Deadline. Ecology will approve or deny the request within 60 days of receipt of a complete Modification of Coverage request.

8.3 Level Three Corrective Actions – Treatment BMPs

In the event an applicable benchmark value (for a single parameter) is exceeded for any three quarters during a calendar year, a Level 3 Corrective Action shall be completed in accordance with the following:

1. Review the SWPPP and ensure that it fully complies with DOE *Industrial Stormwater General Permit*, Condition S3.
2. Make appropriate revisions to the SWPPP to include additional Treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges.
    a. The revised SWPPP shall be signed and certified in accordance with DOE *Industrial Stormwater General Permit*, Condition S3.A.6.
    b. A licensed professional engineer, geologist, hydrogeologist, or Certified Professional in Storm Water Quality (CPSWQ) shall design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.
        i. Ecology may waive the requirement for a licensed or certified professional upon request and demonstration that Socco or the treatment device vendor can properly design and install the treatment device.
        ii. Ecology will not waive the Level 3 requirement for a licensed or certified professional more than one time during the permit cycle.
3. Summarize the Level 3 Corrective Actions (planned or taken) in the Annual Report – see Section 9.2.
4. **Level 3 Deadline:** The revised SWPPP shall be fully implemented as soon as possible, but no later than September 30th the following year.
    a. If installation of necessary Treatment BMPs is not feasible by the Level 3 Deadline; Ecology may approve additional time by approving a Modification of Permit Coverage.
    b. If installation of Treatment BMPs is not feasible or not necessary to prevent discharges that may cause or contribute to violation of a water quality standard, Ecology may waive the requirement for Treatment BMPs by approving a Modification of Permit Coverage.
    c. To request a time extension or waiver, a detailed explanation (including the technical bases) of why the extension or waiver is requested and a Modification of Coverage form to Ecology in accordance with Condition S2.B, by June 1st prior to the Level 3 Deadline. Ecology will approve or deny the request within 60 days of receipt of a complete Modification of Coverage request.

9.0 REPORTING AND RECORD KEEPING

9.1 Discharge Monitoring Reports

1. Sampling data obtained during each reporting period shall be submitted on a Discharge Monitoring Report (DMR) form provided, or otherwise approved, by Ecology. See Appendix G for a copy of this form.)
2. The sampling results shall be submitted within 45 days of the end of each reporting period.
3. The first reporting period shall begin on the effective date of permit coverage.
4. The DMRs shall be postmarked or received by Ecology by the DMR Due Dates below:

Table 9.1: Reporting Dates and DMR Due Dates Reporting Period Months DMR Due Date

Reporting Period	Months	DMR Due Date
1st	January-March	May 15
2nd	April-June	August 14
3rd	July-Sept	November 14
4th	October-December	February 14

5. DMRs shall be submitted using Ecology's WebDMR system or by mail to the following address:

   Department of Ecology Water Quality Program – Industrial Stormwater
   PO Box 47696
   Olympia, Washington 98504-7696

6. A DMR shall be submitted each reporting period, whether or not the facility has discharged stormwater from the site.
   a. If no stormwater sample was obtained from the site during a given reporting period, the DMR form shall be submitted indicating "no sample obtained", or "no discharge during the quarter", as applicable.
   b. If sampling has been suspended for a parameter due to consistent attainment, the DMR shall be submitted and indicated that it has achieved Consistent Attainment for that parameter(s).

9.2 Annual Reports

1. A complete and accurate Annual Report shall be submitted to the Department of Ecology no later than May 15th of each year (except 2010) using a form provided by or otherwise approved by Ecology.
2. The annual report shall include corrective action documentation as required in Sections 8.1, 8.2, and 8.3 of this Plan. If corrective action is not yet completed at the time of submission of this annual report, the status of any outstanding corrective action(s) must be described.
3. The following information shall be included with each annual report.
   a. Identify the condition triggering the need for corrective action review.
   b. Describe the problem(s) and identify the dates they were discovered.

c. Summarize any Level 1, 2 or 3 corrective actions completed during the previous calendar year and include the dates it completed the corrective actions.

d. Describe the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, and identify the date it expects to complete corrective actions.

4. A copy of all annual reports shall be retained onsite for Ecology review.

9.3 Records Retention

1. The following documents shall be retained onsite for a minimum of five years:
   a. A copy of this permit.
   b. A copy of the permit coverage letter.
   c. Records of all sampling information specified in Section 6.0 of this Plan.
   d. Inspection reports including documentation specified in Section 7.0 of this Plan.
   e. Any other documentation of compliance with permit requirements.
   f. All equipment calibration records.
   g. All BMP maintenance records.
   h. All original recordings for continuous sampling instrumentation.
   i. Copies of all laboratory reports.
   j. Copies of all reports required by this permit.
   k. Records of all data used to complete the application for this permit.
2. The period of records retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by Socco, or when requested by Ecology.
3. All plans, documents and records required by this permit shall be made immediately available to Ecology or the local jurisdiction upon request; or within 14 days of a written request from Ecology.

D. Additional Sampling

If Socco samples any pollutant at a designated sampling point more frequently than required by this permit, then the results shall be included in the calculation and reporting of the data submitted in the DMR.

E. Reporting Permit Violations

1. In the event Socco is unable to comply with any of the terms and conditions of this permit which may endanger human health or the environment, or the facility experiences any bypass or upset which causes an exceedance of any effluent limitation in the permit, Socco shall:
   a. Immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem.
   b. Immediately notify the appropriate Ecology regional office of the failure to comply.
   c. Submit a detailed written report to Ecology within 30 days unless Ecology requests an earlier submission. The report shall contain:
      i. A description of the noncompliance, including exact dates and times.

ii. Whether the noncompliance has been corrected and, if not, when the noncompliance will be corrected.
iii. The steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

2. Compliance with the requirements of this section does not relieve Socco from responsibility to maintain continuous compliance with the terms and conditions of this permit or the resulting liability for failure to comply.

9.4 Public Access to SWPPP

Access to, or a copy of, the SWPPP shall be provided to the public when requested in writing. Upon receiving a written request from the public for the SWPPP, Socco shall:

1. Provide a copy of the SWPPP to the requestor within 14 days of receipt of the written request; or
2. Notify the requestor within 10 days of receipt of the written request of the location and times within normal business hours when the requestor may view the SWPPP , and provide access to the SWPPP within 14 days of receipt of the written request; or
3. Provide a copy of the plans and records to Ecology, where the requestor may view the records, within 14 days of a request; or may arrange with the requestor for an alternative, mutually agreed upon location for viewing and/or copying of the plans and records. If access to the plans and records is provided at a location other than at an Ecology office, the Socco will provide reasonable access to copying services for which it may charge a reasonable fee.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

December 3, 2014

Gary Jones
Owner
Socco Inc
601 W Front St
Sumas, WA 98295-9651

Facility Name: SOCCO INC
Location: 601 A WEST FRONT ST
Sumas, WA 98295-9623
Permit No: WAR007539
County: Whatcom

RE: Reissuance of Coverage under the Industrial Stormwater General Permit

Dear Gary Jones:

The Washington Department of Ecology (Ecology) has reissued the Industrial Stormwater General Permit (permit). A copy of your new permit is enclosed. **Retain this letter with your permit and Stormwater Pollution Prevention Plan. It is the official record of permit coverage for your facility.** Ecology issued the final permit December 3, 2014 and it becomes effective January 2, 2015.

Permit Overview
The new permit has a number of changes. The most significant changes are summarized in the enclosed "Summary of Changes" table. You can find more information on Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/industrial/index.html. Please contact Ecology if you have any questions.

New Reporting Requirements
Beginning in 2015, you must submit Discharge Monitoring Reports and Annual Reports electronically, using Ecology's Water Quality Permitting Portal– Permit Submittals application, unless a waiver from electronic reporting has been granted. You can find more information regarding Ecology's Water Quality Permitting Portal on our website at: http://www.ecy.wa.gov/programs/wq/permits/paris/webdmr.html.

If you have technical questions regarding Ecology's Water Quality Permitting Portal, please contact the portal staff at (800) 633-6193/option 3 or email WQWebPortal@ecy.wa.gov.

Site Specific Monitoring Requirements
Enclosed is a summary of the monitoring requirements for your facility. This summary is based on the best information available to Ecology about your facility. If you believe there is a discrepancy between what the permit requires and the enclosed summary, please contact Ecology immediately. In the case of a difference between the permit as applied to your facility and the summary, the permit requirements take precedence.

Your Right to Appeal the Permit
You have a right to appeal the terms and conditions of this general permit to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this permit issuance notice. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do the following within 30 days of the date of receipt of this notice:

- File your appeal and a copy of this notice with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this notice on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

Address and Location Information

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	**Department of Ecology** Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Road SW, Suite 301 Tumwater, WA 98501	**Pollution Control Hearings Board** PO Box 40903 Olympia, WA 98504-0903

For Additional Information or Assistance
Ecology is committed to providing assistance to you. Please review our web page at http://www.ecy.wa.gov/programs/wq/stormwater/industrial/index.html. For questions about transfers, terminations, and other administrative issues, please contact Shawn Hopkins at shop461@ecy.wa.gov or (360) 407-6442.

If you have questions regarding stormwater management issues at your site, please contact Kurt Baumgarten at kuba461@ecy.wa.gov or (360) 715-5210.

Questions
If you have questions regarding the permit, please contact Jeff Killelea at jeff.killelea@ecy.wa.gov or (360) 407-6127.

Sincerely,

Bill Moore

Bill Moore, P.E., Manager
Program Development Services Section
Water Quality Program

Enclosures

Permit No: WAR007539
Facility Name: SOCCO INC
Location: 601 A WEST FRONT ST
Sumas, WA 98295-9623
SIC Codes: 2421, 2499

Summary of Your Facility's ISGP Monitoring Requirements

This summary is based on the best information available to Ecology about your facility. If you believe there is a discrepancy between what the permit requires and the enclosed summary, please contact Ecology immediately. In the case of a difference between the permit as applied to your facility and the summary, the permit requirements take precedence.

Benchmarks and Sampling Requirements Applicable to All Facilities (Condition S5, Table 2)

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level[1]
Turbidity	NTU	25	EPA 180.1 Meter	0.5
pH	SU	Between 5.0 - 9.0	Meter/Paper[2]	±0.5
Oil Sheen	Yes/No	No visible oil sheen	N/A	N/A
Copper, Total	µg/L	Western WA: 14 Eastern WA: 32	EPA 200.8	2.0
Zinc, Total	µg/L	117	EPA 200.8	2.5

[1]The Permittee shall ensure laboratory results comply with the quantitation level (QL) specified in the table. However, if an alternate method from 40 CFR Part 136 is sufficient to produce measurable results in the sample, the Permittee may use that method for analysis. If the Permittee uses an alternative method it must report the test method and QL on the discharge monitoring report.
[2]Permittees shall use either a calibrated pH meter or narrow-range pH indicator paper with a resolution not greater than ± 0.5 Standard Units.

Industry-Specific Benchmarks and Sampling Requirements (Condition S5, Table 3)

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level[1]
Chemical Oxygen Demand (COD), Total	mg/L	120	SM 5220-D	10
Total Suspended Solids (TSS)	mg/L	100	SM 2540 D	5

[1]The Permittee shall ensure laboratory results comply with the quantitation level (QL) specified in the table. However, if an alternate method from 40 CFR Part 136 is sufficient to produce measurable results in the sample, the Permittee may use that method for analysis. If the Permittee uses an alternative method it must report the test method and QL on the discharge monitoring report.

Additional Sampling

Ecology may have established site-specific sampling requirements in addition to those contained in the ISGP (Administrative Order, permit modification, etc.). These additional requirements are not addressed in this summary.

Summary of Significant Changes to the 2015 Industrial Stormwater General Permit

Permit Section(s)	2010 ISGP	2015 ISGP
S1. Permit Coverage		
S1.A Facilities required to seek permit coverage	*SIC 4953: Active landfills, including, but not limited to, wood waste and inert landfills, transfer stations, open dumps, compost facilities, and land application sites, except as described in S1.C.6 or C.7.*	*SIC 4953: ~~Active Landfills~~ Refuse Systems, including, but not limited to, ~~wood waste and inert~~ landfills, transfer stations, open dumps, ~~compost facilities,~~ and land application sites, except as described in S1.C.6 or C.7.* Note: Compost Facilities moved from SIC 4953 to SIC 28xx
S1.D Facilities excluded from permit coverage	N/A	Added: *40 CFR 449.11(a) Airports with more than 10,000 annual jet departures.*
S1.D Facilities excluded from permit coverage	*Facilities located on Tribal lands or facilities that discharge stormwater to receiving waters subject to water quality standards of Indian Tribes, including portions of the Puyallup River and other waters on trust or restricted lands within the 1873 Survey Area of the Puyallup Tribe of Indians Reservation.*	Summary: Clarified that ISGP is not applicable on "Indian Country" as defined in 18 U.S.C. §1151, except specific portions of the Puyallup Reservation. Refer to ISGP Condition S1.D.4 for full language. Note: U.S. EPA's Multi-Sector General Permit applies to areas where the ISGP does not.
S3. Stormwater Pollution Prevention Plan		
S3.A.3 Proper Selection and Use of Stormwater Management Manuals	*Stormwater Management Manual for Western Washington (2005 edition), for sites west of the crest of the Cascade Mountains.*	*Stormwater Management Manual for Western Washington (~~2005~~ 2012 edition), for sites west of the crest of the Cascade Mountains.*
S3.A/B SWPPP Updates	Update SWPPP to be consistent with 2010 ISGP by 7/1/10	Update SWPPP to be consistent with 2015 ISGP by 1/30/15
S3.B Specific SWPPP requirements; Operational Source Control; Preventative Maintenance	N/A	New Language: *Maintain ponds, tanks/vaults, catch basins, swales, filters, oil/water separators, drains, and other stormwater*

Note: This document contains summaries of key changes; please refer to the 2015 ISGP for complete information. Language in *italics* is actual permit language. Underlined language is new, and ~~struck~~ language was deleted.

Permit Section(s)	2010 ISGP	2015 ISGP
		drainage/treatment facilities in accordance with the Maintenance Standards set forth in the applicable Stormwater Management Manual (SWMM), other guidance documents or manuals approved in accordance with S3.A.3.c., demonstrably equivalent BMPs per S3.A.3.d., or an O&M Manual submitted to Ecology in accordance with S8.D.
S3.B Specific SWPPP requirements; Inspections and Recordkeeping	N/A	At a minimum the SWPPP shall: *f) Include all inspection reports completed by the Permittee (S7.C).*
S4. Sampling and S5. Benchmarks and Effluent Limitations		
S4.B.2 Sample Location(s)	d. The exception to sampling each point of discharge in S4.B.2.c does not apply to any point of discharge subject to numeric effluent limitations (Conditions S5.C, S6.C & S6.D).	~~d. The exception to sampling each point of discharge in S4.B.2.c does not apply to any point of discharge subject to numeric effluent limitations (Conditions S5.C, S6.C & S6.D).~~ New Language: d. The Permittee shall notify Ecology of any changes or updates to sample locations, discharge points, and/or outfalls by submitting an "Industrial Stormwater General Permit Discharge/Sample Point Update Form" to Ecology. Refer to Appendix 2 for definition of *Substantially Identical Discharge Point.*
S4.B.3.h Sample Documentation	Summary: Not required to record weather conditions at time of sampling.	Summary: Permittees must record weather conditions at time of sampling. Existing Permit Language: *For each stormwater sample taken, the Permittee shall record the following information and retain it on-site for Ecology review:* New Language: h. Weather conditions.
S4.B.6 Consistent Attainment	Summary: Consistent attainment limited to samples collected	Summary of change: Consistent attainment may be based upon samples collected prior to effective date of

Permit Section(s)	2010 ISGP	2015 ISGP
	after effective date of permit.	2015 ISGP. Once consistent attainment is achieved, may suspend sampling for a period of 3 years, regardless of expiration of 2010 ISGP or effective date of 2015 ISGP. Refer to Condition S4.B.6 for new language.
S5.A.3. Benchmark and Sampling Requirements; and S5.B.2. Additional Sampling Requirements for Specific Industrial Groups	*Permittees monitoring more than once per quarter shall average all of the monitoring results for each parameter (except pH and "visible oil sheen") and compare the average value to the benchmark value.*	Summary of Change: Language added to specify methodology for averaging multiple values collected during a single 24-hr period. Existing Permit Language: *Permittees monitoring more than once per quarter shall average all of the monitoring results for each parameter (except pH and "visible oil sheen") and compare the average value to the benchmark value.* [Clarifying Language Added:] *<u>However, if Permittees collect more than one sample during a 24-hour period, they must first calculate the daily average of the individual grab sample results collected during that 24-hour period; then use the daily average to calculate a quarterly average.</u>*
S5.B. Table 3: Additional Benchmarks and Sampling Requirements Applicable to Specific Industries	Summary: Limited TPH-Dx sampling/benchmark to SICs 10xx, 33xx, 34xx, 5015, 5093, and Hazardous Waste Treatment, Storage and Disposal Facilities	Summary of Change: Expanded the applicability of Petroleum Hydrocarbons Benchmark (10 mg/L NWTPH-Dx) to Transportation Facilities in SICs 40xx – 45xx (except 4221-25), and Petroleum Bulk Stations and Terminals (5171). Refer to Condition S5.B. Table 3.
S5.C Landfills and Airports Subject to Effluent Limitation Guidelines	N/A	Add: Ammonia (Total as N); 14.7 mg/L Maximum Daily Limit Affected Facilities: Airports with 1,000+ annual jet departures that use urea-containing deicing products

Permit Section(s)	2010 ISGP	2015 ISGP
		Refer to Condition S5.C. Table 5
S6. Discharges to Impaired Waterbodies		
S6.C. Additional Sampling Requirements and Effluent Limits for Discharges to Certain Impaired Waterbodies and Puget Sound Sediment Cleanup Sites	N/A	[Clarifying Language Added:] *If an outfall is subject to an impaired waterbody effluent limit (Condition S6.C) for a parameter that also has a benchmark (Condition S5), the effluent limit supersedes the benchmark.*
S6.C. Additional Sampling Requirements and Effluent Limits for Discharges to Certain Impaired Waterbodies and Puget Sound Sediment Cleanup Sites	Summary of 2010 ISGP: If receiving water is Category 5 for Sediment: • Sample TSS quarterly • 30 mg/L TSS limit, effective 1/1/10; unless compliance schedule granted.	Summary of Change: If receiving water is Category 5 for Sediment: • Sample TSS quarterly • 30 mg/L TSS limit, effective 1/1/17; but if discharge was subject to TSS limit under 2010 ISGP, TSS limit effective 1/1/15. If Non-Category 5 Puget Sound Sediment Cleanup Site (Defined in Appendix 2): • Sample TSS quarterly • 30 mg/L TSS benchmark, effective 1/1/17 • If discharge is subject to different TSS benchmarks, the lower benchmark controls. Discharges to ISGP-defined Puget Sound Sediment Cleanup Sites are subject to additional storm drain line cleaning BMPs, solids sampling, and reporting. (See S6.C)
S6.D. Requirements for Discharges to Waters with Applicable TMDLs	N/A	[Clarifying Language Added:] *If an outfall is subject to a TMDL-related effluent limit (Condition S6.D) for a parameter that also has a benchmark (Condition S5), the effluent limit supersedes the benchmark.*
S8.Corrective Actions		
S8. B.1. Level One Corrective Actions – Operational Source Control BMPs	1. *Within 14 days of receipt of sampling results that indicate a benchmark exceedance:*	[Language added to clarify how the 14-day response time works with quarterly averages (S5.A.3, S5.B.2 and/or S6.C.2.c)] 1. *Within 14 days of receipt of*

Permit Section(s)	2010 ISGP	2015 ISGP
		sampling results that indicate a benchmark exceedance for a given quarter; or, for parameters other than pH or visible oil sheen, the end of the quarter, whichever is later:
S8. C. Level Two Corrective Actions – Structural Source Control BMPs	N/A	[Clarifying Language Added:] *While a time extension is in effect, benchmark exceedances (for the same parameter) do not count towards additional Level 2 or 3 Corrective Actions.*
S8.D.2.	*A licensed professional engineer, geologist, hydrogeologist, or Certified Professional in Storm Water Quality (CPSWQ) shall design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.* *i. Ecology may waive the requirement for a licensed or certified professional upon request of the Permittee and demonstration that the Permittee or treatment device vendor can properly design and install the treatment device; or the treatment BMP doesn't require site-specific design or sizing (e.g., off-the-shelf filtration units, etc.).* *ii. Ecology will not waive the Level 3 requirement for a licensed or certified professional more than one time during the permit cycle.*	*A Qualified Industrial Stormwater Professional shall review the revised SWPPP, sign the SWPPP Certification Form, and certify that it is reasonably expected to meet the ISGP benchmarks upon implementation. Upon written request Ecology may, one time during the permit cycle, waive this requirement on a case-by-case basis if a Permittee demonstrates to Ecology's satisfaction that the proposed Level 3 treatment BMPs are reasonably expected to meet ISGP benchmarks upon implementation.*
S8.D. Level Three Corrective Actions – Treatment BMPs	[Summary:] Before installing engineered structures, Permittee shall submit an engineering	[Summary:] Before installing engineered structures, Permittee shall submit an engineering report, plans and specifications, and an

Permit Section(s)	2010 ISGP	2015 ISGP
	report, plans and specifications, and an O&M Manual to Ecology for review in accordance with Chapter 173-240 WAC. (See 2010 Condition S8.D)	O&M Manual to Ecology for review. The engineering report must address 7 elements set forth in S8.D.3.a. O&M Manual submitted to Ecology no later than 30 days after installation. (See 2015 ISGP Condition S8.D) [Clarifying Language Added:] *While a time extension is in effect, benchmark exceedances (for the same parameter) do not count towards additional Level 2 or 3 Corrective Actions.*
S9. Reporting and Recordkeeping		
S9.A Discharge Monitoring Reports	[Summary:] DMRs and other written reports must be submitted electronically or by mail.	[Summary:] DMRs and other written reports must be submitted electronically (Water Quality Permitting Portal), unless waiver granted. Clarified first DMR due date when facility obtains permit coverage mid-permit cycle.
S9.B. Annual Reports	N/A	Clarified that Annual Reports are not required if the permittee didn't have permit coverage during the previous calendar year.
S9.B. Annual Reports	N/A	[Clarifying Language Added:] *Primary airport permittees with at least 1,000 annual jet departures shall include a certification statement in each annual report that it does not use airfield deicing products that contain urea. Alternatively, permittees shall meet the numeric effluent limit for ammonia in Condition S5.C. Table 5.*
S9.E. Reporting Permit Violations	[Summary:] Written reports of non-compliance must be submitted within 30 days.	[Summary:] Written reports of non-compliance must be submitted within 5 days; may be waived on a case by case basis, if phone notification occurs within 24 hours. All written reports must be submitted electronically, unless waiver granted.

Permit Section(s)	2010 ISGP	2015 ISGP
Appendix 2 - Definitions		
Appendix 2 - Definitions	N/A	[Summary:] Several new definitions added: Airfield Pavement Airside Annual Non-propeller Aircraft Departures Average Daily Average Deicing Discharge Point First Fall Storm Event Outfall Puget Sound Sediment Cleanup Site Responsible Corporate Officer Substantially Identical Discharge Point

What do I need to use the WQWebDMR system?

The WQWebDMR system requires a few common computer components:

- PC or Mac.
- DSL or Broadband Internet connection.
- Web browser (Internet Explorer 7.0 or higher, Chrome, FireFox, etc.).
- Personal e-mail account.
- Printer.

So how do I get started?

Step by step registration instructions, with screen shots, are provided at: www.ecy.wa.gov/programs/wq/permits/paris/webdmr.html

Click on the "How to register for WQWebDMR" link to download the registration instructions.

The steps are summarized here:

1. Sign up for a Secure Access Washington (SAW) account or use an existing SAW account.
2. In SAW, register for a new service: Water Quality Permitting Portal (WQWebDMR).
3. Define a "role" under your permit.
4. Create an electronic signature account (if required).
5. Fill out the electronic signature agreement form (ESAF), print it, and mail to Ecology (if required).
6. Look for your approval e-mail and follow the instructions contained in it.

Need help?

Please feel free to contact Ecology if you have any questions about WQWebDMR.

For technical assistance and help getting registered, contact the WQWebDMR help staff at:

E-mail: WQWebPortal@ecy.wa.gov
Phone: 1-800-633-6193/Option 3
or 360-407-7097 (Olympia Area)

For permit-specific or urgent issues, please contact the one of the Ecology offices below:

Central Regional Office - Yakima
WQWebDMR-CRO@ecy.wa.gov

Eastern Regional Office - Spokane
WQWebDMR-ERO@ecy.wa.gov

Northwest Regional Office - Bellevue
WQWebDMR-NWRO@ecy.wa.gov

Southwest Regional Office - Lacey
WQWebDMR-SWRO@ecy.wa.gov

Major Industrial Unit (Ecology HQ)
WQWebDMR-Industrial@ecy.wa.gov

Stormwater Unit (Ecology HQ)
WQWebDMR-Stormwater@ecy.wa.gov

If you need this document in a version for the visually impaired, call the Water Quality Program at 360-407-6600.. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.

Water Quality Permitting Portal (WQWebDMR)

Washington State Department of Ecology

DEPARTMENT OF ECOLOGY
State of Washington

Publication No. 11-10-013
Rev. 09/2013

What is WQWebDMR?

WQWebDMR is a new approach to submitting your Discharge Monitoring Reports (DMRs) to the Department of Ecology. Unlike the current paper method, this new system is fast, available 24/7 over the Internet, and customized for your facility and permit(s).

There is no longer a need to calculate the delay for mailing your paper DMRs. Instead, log onto the Internet, select your permit information, select the begin date, enter your values, and then submit the data. We'll even store your data for you after you submit the DMR, just in case you need to redo or reprint it.

How much does it cost?

There are no fees for registering for and using the WQWebDMR system.

Must all DMR submittals be by WQWebDMR?

The WQWebDMR is currently voluntary for most permits. As Ecology reissues permits it is requiring use of WQWebDMR; for example facilities covered by the construction stormwater general permit must submit DMRs electronically. We encourage all facilities to try WQWebDMR and find out how easy it is to submit a DMR.

Who can have access & what does that access allow?

There are four different roles to choose from when you sign up for WQWebDMR. They are:

Facility Coordinator – Can assign staff to the signer and preparer roles to work on DMRs, and can sign and prepare DMRs themselves. Examples: permittee, responsible official, delegated authority (environmental manager).

Facility Signer – Can sign and prepare DMRs, and is usually granted access to WQWebDMR by a Facility Coordinator. Example: delegated authority (plant supervisor, CESCL).

Facility Preparer – Can prepare DMRs and is granted access to WQWebDMR only by a Facility Coordinator. Examples: contractors, secretaries, data entry staff.

Facility Administrator – Can assist Facility Coordinator with assigning others to prepare and sign DMRs and can also prepare DMRs. Examples: administrative assistant and project leads.

If I sign DMRs for more than one facility/permit, do I need a WQWebDMR account for each?

You can register more than one facility/permit under one account. All we ask is that when you register (as a coordinator or signer), you provide proof that you are responsible for each of your listed facilities/permits.

What sort of proof do I need to register?

Proof comes in the form of a copy of one of the following:

- A previously submitted DMR.
- A permit's cover sheet.
- A permit's letter of coverage.
- Mail from Ecology that includes both the facility's name and the permit number.
- Signature authority delegation letter signed by the permittee (responsible official).

What do I get out of this?

With this system you will have the following benefits:

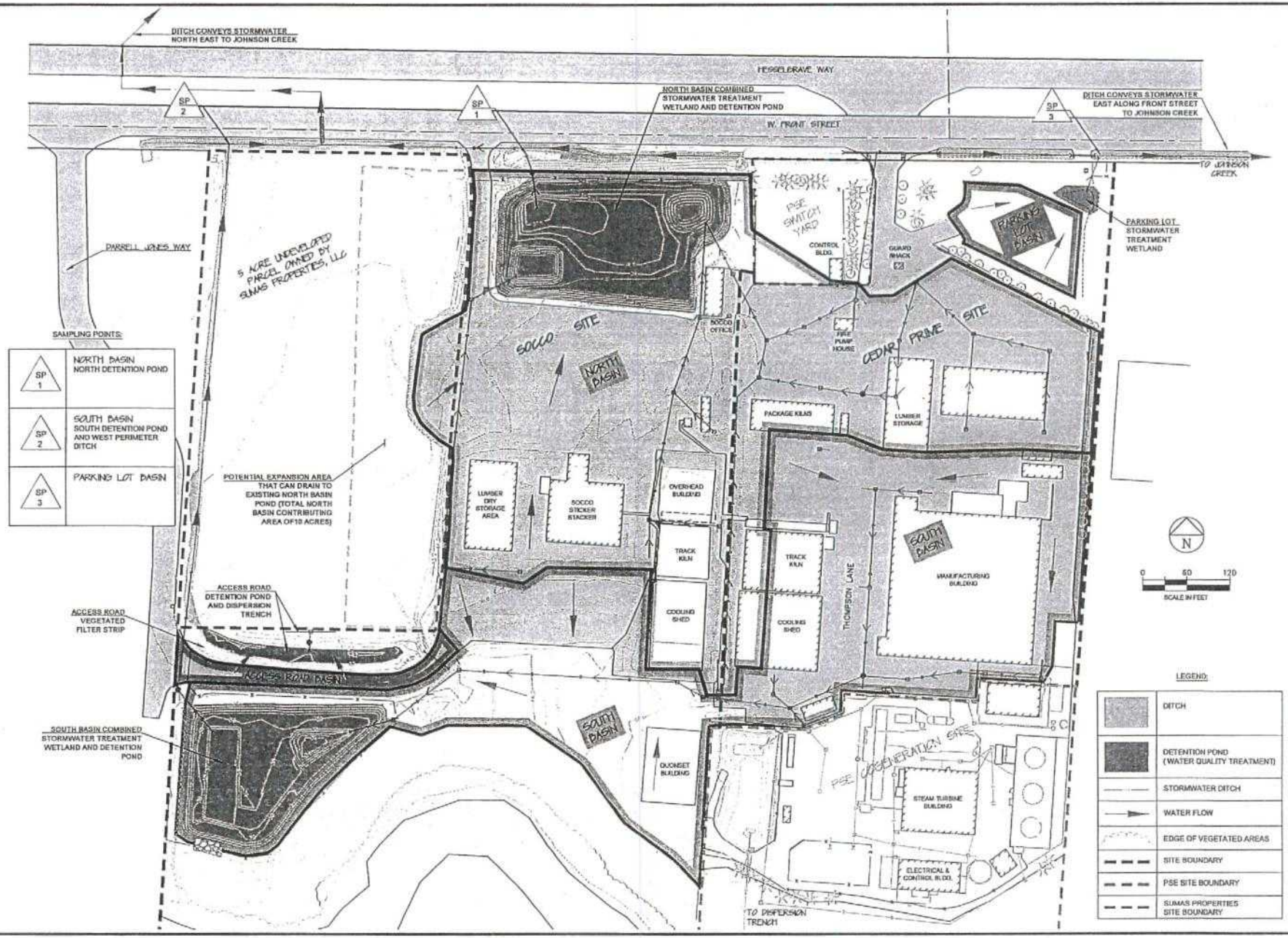
- Available 24/7.
- Enter both daily and summarized data together.
- Enter your data over time or all at once.
- No delay between mailing the DMR and Ecology receiving it.
- Fill in the data at one location then inform your supervisor in another location to view and submit the DMR.
- Electronic DMRs are customized for both the facility and the permit, including specific reporting requirements for your permit.
- Person signing DMR gets immediate e-mail confirmation.
- Submitted DMRs can be accessed online for re-printing or re-submitting.
- You can add attachments (lab sheets, etc.) to your DMR submission.
- System tracks by whom and when a DMR was submitted.
- Notifies signatory the DMR is ready to sign.
- Add monitoring points when you need them (construction stormwater and sand & gravel general permits only).

NOTE: The WAWebDMR name changed to WQWebDMR on June 20

- The banner on the main WQWebDMR page has changed
- New web address is https://secureaccess.wa.gov/ecy/wqwebportal

10.0 COMPLIANCE WITH STANDARDS

1. Discharges shall not cause or contribute to a violation of *Surface Water Quality Standards* (Chapter 173-201A WAC), *Ground Water Quality Standards* (Chapter 173200WAC), *Sediment Management Standards* (Chapter 173-204 WAC), and human health-based criteria in the *National Toxics Rule* (40 CFR 131.36). Discharges that are not in compliance with these standards are prohibited.
2. Ecology will presume compliance with water quality standards, unless discharge monitoring data or other site specific information demonstrates that a discharge causes or contributes to violation of water quality standards, when Socco is:
    a. In full compliance with all permit conditions, including planning, sampling, monitoring, reporting, and recordkeeping conditions.
    b. Fully implementing stormwater best management practices contained in stormwater technical manuals approved by the department, or practices that are demonstrably equivalent to practices contained in stormwater technical manuals approved by Ecology, including the proper selection, implementation, and maintenance of all applicable and appropriate best management practices for onsite pollution control.
3. Prior to the discharge of stormwater and non-stormwater to waters of the state, Socco shall apply all known and reasonable methods of prevention, control, and treatment (AKART). To comply with this condition, Socco shall prepare and implement an adequate SWPPP (this Plan), with all applicable and appropriate BMPs, including the BMPs necessary to meet the standards identified in Section 10.1 of this Plan, and shall install and maintain the BMPs in accordance with the SWPPP, applicable SWMMs, and the terms and conditions of this permit.



SOCCO, INC.

STORMWATER POLLUTION PREVENTION PLAN

FACILITY SITE PLAN

CASCADE ENGINEERING GROUP, P.S., INC.
119 Grand Avenue, Suite D
Bellingham, Washington 98225
(360) 306-6161

REVISIONS	DATE

DATE: 09/27/2011
DESIGN: MJD
DRAWN: ELR
CHECKED:

SCALE: AS SHOWN

PROJECT NUMBER: SOCO0002

DRAWING FILE:

SHEET NO. 1 OF 1

09/27/2011 2:58PM P:\S\SOCO0002\0430CAD\DWG\Sheets\SOCO SWPPP Site Map.dwg

APPENDIX A

***2010 Industrial Stormwater General Permit*, Washington State Department of Ecology**
(Issuance Date: October 21, 2009, Effective Date: January 1, 2010, Expiration Date: January 1, 2015.

ATTACHMENT D

Permit Coverage Letter

Dated: December 3, 2014

Socco, Inc.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

December 3, 2014

Gary Jones
Owner
Socco Inc
601 W Front St
Sumas, WA 98295-9651

Facility Name: SOCCO INC
Location: 601 A WEST FRONT ST
Sumas, WA 98295-9623
Permit No: WAR007539
County: Whatcom

RE: Reissuance of Coverage under the Industrial Stormwater General Permit

Dear Gary Jones:

The Washington Department of Ecology (Ecology) has reissued the Industrial Stormwater General Permit (permit). A copy of your new permit is enclosed. **Retain this letter with your permit and Stormwater Pollution Prevention Plan. It is the official record of permit coverage for your facility.** Ecology issued the final permit December 3, 2014 and it becomes effective January 2, 2015.

Permit Overview
The new permit has a number of changes. The most significant changes are summarized in the enclosed "Summary of Changes" table. You can find more information on Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/industrial/index.html. Please contact Ecology if you have any questions.

New Reporting Requirements
Beginning in 2015, you must submit Discharge Monitoring Reports and Annual Reports electronically, using Ecology's Water Quality Permitting Portal– Permit Submittals application, unless a waiver from electronic reporting has been granted. You can find more information regarding Ecology's Water Quality Permitting Portal on our website at: http://www.ecy.wa.gov/programs/wq/permits/paris/webdmr.html.

If you have technical questions regarding Ecology's Water Quality Permitting Portal, please contact the portal staff at (800) 633-6193/option 3 or email WQWebPortal@ecy.wa.gov.

Site Specific Monitoring Requirements
Enclosed is a summary of the monitoring requirements for your facility. This summary is based on the best information available to Ecology about your facility. If you believe there is a discrepancy between what the permit requires and the enclosed summary, please contact Ecology immediately. In the case of a difference between the permit as applied to your facility and the summary, the permit requirements take precedence.

Your Right to Appeal the Permit
You have a right to appeal the terms and conditions of this general permit to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this permit issuance notice. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do the following within 30 days of the date of receipt of this notice:

- File your appeal and a copy of this notice with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this notice on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

Address and Location Information

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	**Department of Ecology** Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Road SW, Suite 301 Tumwater, WA 98501	**Pollution Control Hearings Board** PO Box 40903 Olympia, WA 98504-0903

For Additional Information or Assistance
Ecology is committed to providing assistance to you. Please review our web page at http://www.ecy.wa.gov/programs/wq/stormwater/industrial/index.html. For questions about transfers, terminations, and other administrative issues, please contact Shawn Hopkins at shop461@ecy.wa.gov or (360) 407-6442.

If you have questions regarding stormwater management issues at your site, please contact Kurt Baumgarten at kuba461@ecy.wa.gov or (360) 715-5210.

Questions
If you have questions regarding the permit, please contact Jeff Killelea at jeff.killelea@ecy.wa.gov or (360) 407-6127.

Sincerely,

Bill Moore, P.E., Manager
Program Development Services Section
Water Quality Program

Enclosures

ATTACHMENT E

Notice of Intent

Dated: May 27, 2014

Socco, Inc.

DEPARTMENT OF ECOLOGY
State of Washington

Notice of Intent

Industrial Stormwater General Permit

NOI Version: 1

Application Type: ☐ New ☒ Renewal **Permit Number:** WAR007539 Application Id: 2711

I. Contact Information

Site Contact

Honorific: **First Name:** Gary **Last Name:** Jones
Company Name: Socco Inc **Title:** Owner
Mailing Address: 601 W Front St
City: Sumas **State:** WA **Zip Code:** 98295-9651
Email: gjones@soccoforest.com
Business Phone: 360-988-4900 **Fax:** 360-988-0407 **Cell Phone:**
UBI Number:

Site Contact

Honorific: **First Name:** Gene **Last Name:** Keller
Company Name: Socco Inc **Title:** Production Manager
Mailing Address: 601 W Front St
City: Sumas **State:** WA **Zip Code:** 98295-9651
Email: gkeller@soccoforest.com
Business Phone: 360-988-4900 **Fax:** **Cell Phone:**
UBI Number:

Site Contact

Honorific: **First Name:** Gary **Last Name:** Jones
Company Name: Socco Inc **Title:** General Manager
Mailing Address: 601 W Front St
City: Sumas **State:** WA **Zip Code:** 98295-9651
Email:
Business Phone: 360-988-4900 **Fax:** **Cell Phone:**
UBI Number:

Billing Contact

Honorific: **First Name:** Gary **Last Name:** Jones
Company Name: Socco Inc **Title:** Owner
Mailing Address: 601 W Front St
City: Sumas **State:** WA **Zip Code:** 98295-9651
Email: gjones@soccoforest.com
Business Phone: 360-988-4900 **Fax:** 360-988-0407 **Cell Phone:**
UBI Number:

Legal Responsible Party

Honorific: **First Name:** Gary **Last Name:** Jones
Company Name: Socco Inc **Title:** Owner
Mailing Address: 601 W Front St
City: Sumas **State:** WA **Zip Code:** 98295-9651
Email: gjones@soccoforest.com
Business Phone: 360-988-4900 **Fax:** 360-988-0407 **Cell Phone:**
UBI Number:

Permittee

Honorific: **First Name:** Gary **Last Name:** Jones
Company Name: Socco Inc **Title:** Owner
Mailing Address: 601 W Front St
City: Sumas **State:** WA **Zip Code:** 98295-9651
Email: gjones@soccoforest.com
Business Phone: 360-988-4900 **Fax:** 360-988-0407 **Cell Phone:**
UBI Number:

Site Operator

Honorific: **First Name:** Gary **Last Name:** Jones
Company Name: Socco Inc **Title:** Owner
Mailing Address: 601 W Front St
City: Sumas **State:** WA **Zip Code:** 98295-9651
Email: gjones@soccoforest.com
Business Phone: 360-988-4900 **Fax:** 360-988-0407 **Cell Phone:**
UBI Number:

Site Owner

Honorific: **First Name:** Gary **Last Name:** Jones
Company Name: Socco Inc **Title:** Owner
Mailing Address: 601 W Front St
City: Sumas **State:** WA **Zip Code:** 98295-9651
Email: gjones@soccoforest.com
Business Phone: 360-988-4900 **Fax:** 360-988-0407 **Cell Phone:**
UBI Number:

II. Facility Information

Facility Name: SOCCO INC
Street Address: 601 A WEST FRONT ST
City: Sumas **County:** Whatcom **Zip Code:** 98295-9623
Latitude: 48.992797038 **Longitude:** -122.256739052

Size of Site: 8.7 acres

Date facility began or will begin operation:

List all North American Industry Classification System (NAICS) and Standard Industrial Classification (SIC) codes to cover all industrial activities performed at your facility.

NAICS/SIC	Code	Description	Is Primary
SIC	2421		Yes
SIC	2499		No
NAICS	321999		Yes

Type or Nature of Industrial Activities:

Reman & Kiln Drying Lumber

☐ Is this facility a Hazardous Waste Treatment, Storage, and Disposal (TSD) facility regulated under Chapter 17-303 WAC?

For Airport Facilities:

☐ At your airport, do you as a single permittee, or a combination of permitted facilities, use more than 100,000 gallons of glycol-based deicing chemicals and/or 100 tons or more of urea on an average annual basis?

☐ Does your airport have 1,000 or more annual jet departures ("non-propeller aircraft")?

☐ Does the facility discharge wastewater associated with airfield pavement deicing with stormwater?

☐ Do you use urea-containing deicers?

☐ Does your airport meet the definition of a new source ("new airports")?

☐ Does (will) the airport have 10,000 or more annual departures?

☐ Is the airport located in a cold climate zone?

III. Other Permits/Registration

None

IV. Discharge/Receiving Water

Conveyance System

If you discharge to a municipal stormwater system or other stormwater conveyance system (e.g. Kent stormwater drainage system, roadside ditch), identify the system by name or if unnamed, by other identifier (e.g., 145th street ditch)

Location of Discharge into Receiving Water (Outfall)

Outfall Number	Outfall Description	Surface Waterbody Name	Outfall Type	Latitude	Longitude
SP1	Outfall to Front Street Drainage Ditch	Front Street Drainage Ditch	Surface Water Body	48.99261558 10029	-122.275860 085389
SP2	Outfall to Front Street Drainage Ditch	Front Street Drainage Ditch	Surface Water Body	48.99259798 15166	-122.277595 474621

Location of Discharge Location (Sampling/Monitoring Point)

Monitoring Point Code	Monitoring Point Name	Monitoring Point Type	Outfall Number	Active	Latitude	Longitude
2421	SP1	Stormwater	SP1	Yes	48.992459	-122.2756
2499	SP2	Stormwater	SP2	Yes	48.990308	-122.27751

V. State Environmental Policy Act (SEPA)

This Notice of Intent (NOI) is incomplete and cannot be approved until the applicable SEPA requirements under Chapter 197-11 WAC are met.

SEPA and Public Notice sections apply only to facilities that began operations after January 1, 2015. If the facility began operations before this date, these sections do not need to be filled out.

Who is the SEPA lead agency on your site?

Has the SEPA lead agency issued a final decision on your checklist? ☐ Yes ☐ No ☐ Exempt

If No: The NOI is incomplete. Ecology will hold the application until a final SEPA decision is made or the Construction Stormwater NOI public comment period ends, whichever is later. **You must notify Ecology once the lead agency has issued a determination.**

If Yes: Type of SEPA decision issued:

Date of final SEPA decision:

Date when all SEPA-related comment & appeal periods are exhausted:

If Exempt:

- ☐ Watershed Restoration & Fish Habitat Enhancement Exemption (RCW 43.21C.0382).
- ☐ Infill Development Exemption (RCW 43.21C.229).
- ☐ Planned Action Exemption (RCW 43.21C.031).
- ☐ Categorical Exemption. Under what section of the SEPA Rule (WAC 197-11-800) is it exempt?

  Section: _____

VI. Public Notice

Public Notice applies to facilities that began operations on or after January 1, 2015.

You must publish a public notice at least **once** a week for **two** consecutive weeks with **seven days** between publications, in at least a **single** newspaper of general circulation in the county in which the facility is located. Ecology cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the date of the **second** public notice.

VII. Certification of Permittees

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

	5/27/2014
Permittee Signature	Date

ATTACHMENT F

Monthly Visual Inspection Report

Dated: August 2015

Socco, Inc.

APPENDIX 8: – Visual Inspection Form For Outfalls and Receiving Waters

Municipality of Anchorage

VISUAL INSPECTION FORM

Department of Public Works

Outfall Number: SP1

Part 1 General Information

1. Map to location is? ☐ OK ☐ Incorrect, explain in Part 4, Comments
2. Date: 8/15 ☐ Time: _____ ☐ Inspection Crew Lead: _____
3. How long since last rainfall? ☐ Raining now ☐ 0-2 days ☐ 3 or more days ☒ Unknown
4. Access to end of pipe is? ☐ OK ☐ Far from road, ____ feet ☐ Steep ☐ Ground wet or soft ☐ Blocked ✪

If blocked, by what? ☐ Fence gate/unlocked ☐ Fence gate/locked ☐ Vegetation ☐ Water ☐ Other: _____

Part 2 End-of-Pipe Information

5. End of pipe flows into: ☐ Lake ☐ Stream ☐ Wetland ☒ Ditch ☐ Other _____
6. End of pipe submerged? ☒ No ☐ Yes *If yes, how much?* ☐ less than 25% ☐ about 50% ☐ more than 50%
7. End of pipe crushed? ☒ No ☐ Yes *If yes, how much?* ☐ less than 25% ☐ about 50% ✪ ☐ almost closed ✪
8. Grate on end of pipe? ☒ No ☐ Yes *If yes, is grate locked?* ☐ No ☐ Yes

If yes, is grate plugged? ☐ less than 25% ☐ about 50% ✪ ☐ almost closed ✪

Part 3 Visual Observations

9. Water flowing from end of pipe? ☒ No ☐ Yes

If yes, what does water look like? ☐ Clear ☐ Colored, what color? _____ ☐ Muddy

If yes, are petroleum products present? ☐ No ☐ Yes, in the form of: ☐ Floating globs ☐ Moving sheen

10. Sediment accumulation in pipe? ☒ No ☐ Yes

If yes, how much? ☐ less than 25% full ☐ about 50% full ✪ ☐ more than 50% full ✪

11. Debris accumulation in pipe? ☒ No ☐ Yes

If yes, how much? ☐ less than 25% full ☐ about 50% full ✪ ☐ more than 50% full ✪

Describe debris: _____

12. If end of pipe flows to a ditch, is there (near end of pipe):

Sediment accumulation in ditch? ☒ No ☐ Yes

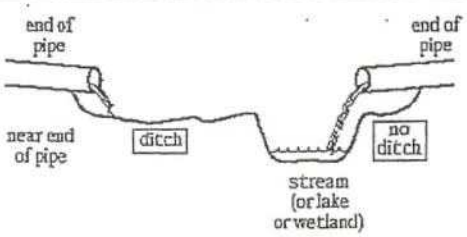
If yes, how much? ☐ less than 25% full ☐ about 50% full ✪ ☐ more than 50% full ✪

Debris accumulation in ditch? ☒ No ☐ Yes

If yes, how much? ☐ less than 25% full ☐ about 50% full ✪ ☐ more than 50% full ✪

Describe debris: _____

Part 4 Comments



NOTE: If the answer to a question has this symbol ✪ next to the entry, flag this form for a supervisor's attention by placing an "X" in the box to the right ☐

APPENDIX 8: – Visual Inspection Form For Outfalls and Receiving Waters

Municipality of Anchorage

VISUAL INSPECTION FORM

Department of Public Works

Outfall Number: SP2

Part 1 General Information

1. Map to location is? ☐ OK ☐ Incorrect, explain in Part 4. Comments
2. Date: 8/15 ☐ Time: _____ ☐ Inspection Crew Lead: _____
3. How long since last rainfall? ☐ Raining now ☐ 0-2 days ☐ 3 or more days ☒ Unknown
4. Access to end of pipe is? ☐ OK ☐ Far from road, ____ feet ☐ Steep ☐ Ground wet or soft ☐ Blocked ✪

If blocked, by what? ☐ Fence gate/unlocked ☐ Fence gate/locked ☐ Vegetation ☐ Water ☐ Other: _____

Part 2 End-of-Pipe Information

5. End of pipe flows into: ☐ Lake ☐ Stream ☐ Wetland ☒ Ditch ☐ Other _____
6. End of pipe submerged? ☒ No ☐ Yes *If yes, how much?* ☐ less than 25% ☐ about 50% ☐ more than 50%
7. End of pipe crushed? ☒ No ☐ Yes *If yes, how much?* ☐ less than 25% ☐ about 50% ✪ ☐ almost closed ✪
8. Grate on end of pipe? ☒ No ☐ Yes *If yes, is grate locked?* ☐ No ☐ Yes

If yes, is grate plugged? ☐ less than 25% ☐ about 50% ✪ ☐ almost closed ✪

Part 3 Visual Observations

9. Water flowing from end of pipe? ☒ No ☐ Yes

If yes, what does water look like? ☐ Clear ☐ Colored, what color? _____ ☐ Muddy

If yes, are petroleum products present? ☐ No ☐ Yes, in the form of: ☐ Floating globs ☐ Moving sheen

10. Sediment accumulation in pipe? ☒ No ☐ Yes

If yes, how much? ☐ less than 25% full ☐ about 50% full ✪ ☐ more than 50% full ✪

11. Debris accumulation in pipe? ☒ No ☐ Yes

If yes, how much? ☐ less than 25% full ☐ about 50% full ✪ ☐ more than 50% full ✪

Describe debris: _____

12. If end of pipe flows to a ditch, is there (near end of pipe):

Sediment accumulation in ditch? ☒ No ☐ Yes

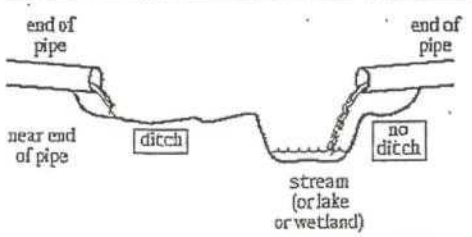
If yes, how much? ☐ less than 25% full ☐ about 50% full ✪ ☐ more than 50% full ✪

Debris accumulation in ditch? ☒ No ☐ Yes

If yes, how much? ☐ less than 25% full ☐ about 50% full ✪ ☐ more than 50% full ✪

Describe debris: _____

Part 4 Comments



NOTE: If the answer to a question has this symbol ✪ next to the entry, flag this form for a supervisor's attention by placing an "x" in the box to the right. ☐

ATTACHMENT G

1st Quarter 2014 Discharge Monitoring Report

And Supporting Documentation

Socco, Inc.

Washington State Department of Ecology — Discharge Monitoring Report (DMR)

Permit Number: WAR007539 **Permittee:** SOCCO INC

Facility County: Whatcom **Receiving Waterbody:** Front Street Drainage Ditch

Monitoring Period: 01/01/2014 - 03/31/2014 **Outfall:** SP1 - Outfall to Front Street Drainage Ditch **Version:** 1

Week	Monitoring Point	Turbidity (NTU) Measured NTU Quarterly Grab	pH Standard Units Quarterly Grab	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total Micrograms/L (ug/L) Quarterly Grab	Oil & Grease Yes/No Quarterly Grab	Total COD Total Milligrams/L (mg/L) Quarterly Grab	Total Suspended Solids (TSS) Total suspended (TSS) Milligrams/L (mg/L) Quarterly Grab
		001	001	001	001	001	001	001
Limit Set		Industrial SW Global Limit Set (Western)	Industrial SW Global Limit Set (Western)	Industrial SW Global Limit Set (Western)	Industrial SW Global Limit Set (Western)	Industrial SW Global Limit Set (Western)	ISWGP Timber	ISWGP Timber
14-M	3/31/14	14	6.0	4.0	52	No	85	14
Average		14		4.0	52		85	14
		BM: <= 25		BM: <= 14	BM: <= 117		BM: <= 120	BM: <= 100
Daily Maximum						No		
						BM: <= 0		

Washington State Department of Ecology — Discharge Monitoring Report (DMR)

Permit Number: WAR007539 **Permittee:** SOCCO INC

Facility County: Whatcom **Receiving Waterbody:** Front Street Drainage Ditch

Monitoring Period: 01/01/2014 - 03/31/2014 **Outfall:** SP2 - Outfall to Front Street Drainage Ditch **Version:** 1

Week	Monitoring Point	Turbidity (NTU) Measured NTU Quarterly Grab	pH Standard Units Quarterly Grab	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total Micrograms/L (ug/L) Quarterly Grab	Oil & Grease Yes/No Quarterly Grab	Total COD Total Milligrams/L (mg/L) Quarterly Grab	Total Suspended Solids (TSS) Total suspended (TSS) Milligrams/L (mg/L) Quarterly Grab
		002	002	002	002	002	002	002
Limit Set		Industrial SW Global Limit Set (Western)	Industrial SW Global Limit Set (Western)	Industrial SW Global Limit Set (Western)	Industrial SW Global Limit Set (Western)	Industrial SW Global Limit Set (Western)	ISWGP Timber	ISWGP Timber
14-M	3/31/14	15	6.3	3.5	113	No	49	13
Average		15		3.5	113		49	13
		BM: <= 25		BM: <= 14	BM: <= 117		BM: <= 120	BM: <= 100
Daily Maximum						No		
						BM: <= 0		

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Gene Keller
Signature

4/18/2014 1:21:11 PM
Date

Washington Department of Ecology Submission Cover Letter

WQWebDMR - DMR Submission Id: 1462110 - 4/18/2014 1:21:12 PM

Report Received Dated: 4/18/2014 1:21:13 PM

Company Name	Signer Name	System Name
Socco Forest Products	Gene Keller	WQWebPortal

Attachments:

Document Name of Description	Document File Name
Submitted Copy of Record for Socco Forest Products	Copy of Record SoccoForestProducts Friday April 18 2014

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only ---

Hf8OwsPusRvLWg5ETLPv+Bpie/KI/1voSJzWilkk1Ujn4LOdpjMnt3wCt6NYfEQG7+/d0g5c0HTwq7Eg5UHw0FI/vo8Ynjt9ZawJYy/tHmk=

Avocet Environmental Testing
1500 North State Street, Suite 200
Bellingham, WA 98225-4551
(360) 734-9033

AVOCET
ENVIRONMENTAL TESTING

Client	Sbcco, Inc.
Contact Name	Gene Keller
Chain of Custody	5943
Date Sampled	03/11/14
Date Received	03/11/14
Date Reported	03/27/14
Matrix	Stormwater

Sample Identification	Log Number	Test Performed	Method	Sample Result	Units	QL	Date Analyzed	Analyst
SP-1	05735487	pH & Temp	sm4500-H	6.0 @ 5.6°C*	S.U.	----	03/11/14	AH
		COD	EPA410.4	85	mg/L	15	03/18/14	AH
		TSS	sm2540D	14	mg/L	10	03/18/14	AH
		Turbidity	EPA180.1	14	NTU	0.1	03/12/14	AH
		Copper	sm3113B	4.0	µg/L	2.0	03/24/14	ML
		Zinc	sm3111B	52	µg/L	15	03/25/14	ML
SP-2	05735488	pH & Temp	sm4500-H	6.1 @ 5.7°C*	S.U.	----	03/11/14	AH
		COD	EPA410.4	26	mg/L	15	03/18/14	AH
		TSS	sm2540D	19	mg/L	4.0	03/18/14	AH
		Turbidity	EPA180.1	27	NTU	0.1	03/12/14	AH
		Copper	sm3113B	16.0	µg/L	2.0	03/24/14	ML
		Zinc	sm3111B	60	µg/L	15	03/25/14	ML

QUALITY CONTROL DATA

Test Performed	QC Known Recovery	QC Known Recovery Limits	Duplicate Difference
COD	103%	90-110%	<1%
TSS	97%	93-99%	7%
Turbidity	99%	94-101%	N/A
Copper	99%	90-110%	8%
Zinc	100%	90-110%	3%

<: Less Than
*: Sample was received past the recommended holding time of 15 minutes.
COD: Chemical Oxygen Demand
N/A: Not Applicable
NTU: Nephelometric Turbidity Units
QL: Quantitation Limit
S.U.: Standard Units
TSS: Total Suspended Solids

Laboratory Supervisor

Avocet Environmental Testing
1500 North State Street, Suite 200
Bellingham, WA 98225-4551
(360) 734-9033

AVOCET
ENVIRONMENTAL TESTING

Client	**Socco, Inc.**
Contact Name	Gene Keller
Chain of Custody	2942
Date Sampled	03/31/14
Date Received	03/31/14
Date Reported	04/15/14
Matrix	Stormwater

Sample Identification	Log Number	Test Performed	Method	**Sample Result**	Units	QL	Date Analyzed	Analyst
SP-2	05736143	pH & Temp	sm4500-H	**6.3* @ 9.2°C**	S.U.	----	03/31/14	ML
		COD	EPA410.4	**49**	mg/L	10	04/14/14	AH
		TSS	sm2540D	**13**	mg/L	6.7	04/01/14	AH
		Turbidity	EPA180.1	**15**	NTU	0.1	04/01/14	AH
		Copper	sm3113B	**3.5**	µg/L	2.0	04/14/14	ML
		Zinc	sm3111B	**113**	µg/L	15	04/14/14	ML

QUALITY CONTROL DATA

Test Performed	QC Known Recovery	QC Known Recovery Limits	Duplicate Difference
COD	110%	90-110%	<1%
TSS	93%	93-99%	1%
Turbidity	99%	94-101%	N/A
Copper	98%	90-110%	11%
Zinc	106%	90-110%	8%

<: Less Than
*: Sample was received past the recommended holding time of 15 minutes.
COD: Chemical Oxygen Demand
N/A: Not Applicable
NTU: Nephelometric Turbidity Units
QL: Quantitation Limit
S.U.: Standard Units
TSS: Total Suspended Solids

Laboratory Supervisor

AVOCET ENVIRONMENTAL TESTING

CHAIN OF CUSTODY

5943

1500 North State Street, Suite 200
Bellingham, WA 98225
(360) 734-9033 FAX (360) 734-6467
TOLL FREE 800/227-9427

CLIENT: Socco Inc
ADDRESS: 601 A West Front Street
CITY, STATE, ZIP: Sumas, WA 98295

CONTACT NAME: Gene Keller
DAY PHONE: (360) 988-4900
FAX: (360) 988-0407

BILLING INFORMATION IF DIFFERENT THAN CLIENT:
NAME:
ADDRESS:
CITY, STATE, ZIP:
COLLECTED BY:
PHONE: ( )

PROJECT NAME:

P.O.#:

SAMPLE IDENTIFICATION	MATRIX	NO. OF CONTAINERS	SAMPLE DATE/TIME	PRESERVATION	ANALYSIS/METHOD REQUESTED	LOG NO. (LAB USE ONLY)
SP-1	STW	GLASS / PLASTIC 1 / OTHER	DATE 3/11/14 TIME 1 pm	☒ Ice Other:	Turb, PH, Zn, Copper, COD, TSS	~~5735486~~ 5735487
SP-2	STW	GLASS / PLASTIC 1 / OTHER	DATE 3/11/14 TIME 1:15 pm	☒ Ice Other:	Turb, PH, Zn, Copper, COD, TSS	5488
		GLASS / PLASTIC / OTHER	DATE / TIME	☐ Ice Other:		
		GLASS / PLASTIC / OTHER	DATE / TIME	☐ Ice Other:		
		GLASS / PLASTIC / OTHER	DATE / TIME	☐ Ice Other:		
		GLASS / PLASTIC / OTHER	DATE / TIME	☐ Ice Other:		
		GLASS / PLASTIC / OTHER	DATE / TIME	☐ Ice Other:		
		GLASS / PLASTIC / OTHER	DATE / TIME	☐ Ice Other:		
		GLASS / PLASTIC / OTHER	DATE / TIME	☐ Ice Other:		

REMARKS: Fax Results

RECEIVED VIA: ☐ CLIENT ☐ AET COURIER ☐ OTHER:
4.2°C
ON ICE? ☐YES ☐NO
TEMP °C
CUSTODY SEAL ☐YES ☐NO ☐N/A

RELEASING SIGNATURE 1. Gene Keller DATE 3/11/14 TIME 4 PM
RECEIVING SIGNATURE 1. DATE 3/11/14 TIME 16:00

RELEASING SIGNATURE 2. DATE TIME
RECEIVING SIGNATURE 2. DATE TIME

ATTACHMENT H

Modification of Permit Coverage Form

Socco, Inc.

CASCADE
ENGINEERING GROUP, P.S., INC.

TRANSMITTAL

DATE: March 2, 2016

TO: **Washington Department of Ecology**
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

FROM: **Mike DiSpigno**

PROJECT: **Socco Stormwater Industrial Permit - WAR007539**

PROJECT NO: **SOCO02**

☒ FOR YOUR REVIEW ☒ FOR YOUR APPROVAL ☐ RETURN REQUESTED
☐ FOR YOUR INFORMATION ☐ RECORDS MANAGEMENT ☐ FOR YOUR USE

ITEM	COPIES	DATE	DESCRIPTION
1	1	3-2-2016	Completed *Modification of Permit Coverage Form for Industrial Stormwater General Permit,* 2 pages

COMMENTS:

Dear Sir/ Madam,

It has come to our attention that our Notice of Intent application for renewal of the site's Industrial Stormwater General Permit, submitted to the DOE in July 2014, had the incorrect area for the size of the site. The site area should be 15 acres, not 8.7 acres as stated in this 2014 form. Attached is a signed application to modify the permit coverage area to 15 acres.

Please contact Gary Jones, the Owner/ Permittee, or me if you have any questions.

Thank you for your assistance.

119 Grand Avenue, Suite D Bellingham, Washington 98225 Phone: (360) 306-8161

DEPARTMENT OF ECOLOGY
State of Washington

Modification of Permit Coverage Form for Industrial Stormwater General Permit

Permit No. WAR007539

I. Operator/Permittee for the Facility (All permit and billing correspondence will be mailed here)

Operator/Permittee's Name	Phone No.	Email Address
Gary Jones	360-988-4900	GJones@SoccoForest.com
Company Name: Socco Inc.		
Street Address or P.O. Box: 601 W. Front Street		
City: Sumas	State: WA	Zip + 4: 98295-9651

II. Modified Permit Information CHECK ALL THAT APPLY

☐ New Industrial Process (requires public notice), please list the associated SIC codes:

1					2					3					4					5				

Type or Nature of New Industrial Activities: _____

Are there new monitoring points associated with the new industrial process? ☐ No ☐ Yes

If no, please list the previously established monitoring points associated with the new process (i.e, CB1, DP4):

_____ NOT APPLICABLE

If yes, please identify new monitoring points: _____

Discharge Identifier. These cannot be symbols. (maximum of three characters ex. 01A)			Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds	Location description (i.e. Catch Basin 1)
			° ' N	° ' W	
			° ' N	° ' W	
			° ' N	° ' W	

If Applicable, New Receiving Water

Receiving Water Body	Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds
	° ' N	° ' W
	° ' N	° ' W

What type of modification are you requesting?

☐ Level 2 / Level 3 Deadline Extension, please list the new deadline requested (MM/DD/YYYY): _____.

- Attach detailed technical basis for extension. Include proposed timeline for completion and describe issues that affect completion date; for example, state/local permits, study, design, financing, professional services and contracting, etc.

☐ Level 2 / Level 3 Waiver. Attach technical basis for request.

- If request is based on claim that it is "not feasible" to perform corrective actions, provide detailed information to support request (e.g., lease, contract, affidavit, maps, photos, and/or other documentation).
- If request is based on claim that corrective action is "not necessary" to prevent violations of water quality standards, Ecology recommends including an engineering report and sampling information to support claim.

☒ Other (please explain): Fix typo in previous Notice of Intent submittal. Site area is 15 acres, not 8.7 acres

III. Public Notice

NOT APPLICABLE

Facilities modifying existing coverage must publish a public notice at least once a week for **two** consecutive weeks with **seven** days in between publications, in a **single** newspaper of general circulation in the county in which the facility is located. Ecology cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the date of the second public notice.
Submit (or fax: 360-407-6426) the application to Ecology on or **before** the date of the first public notice. If you fax the application to Ecology, you must follow up with hard copy by mail.

Date of the first public notice: _____ / _____ / _____
Date of second public notice: _____ / _____ / _____ (Begins 30-day public comment period)
Example: Date of the first public notice: 01 / 01 / 2010
Date of second public notice: 01 / 08 / 2010

Name of the newspaper that will publish the public notices: _____.

Complete this template using site-specific information. The **bold** language is required by WAC 173-226-130 and must be included in its entirety. (Either use the fill-in template below or attach on a separate sheet of paper, if necessary.)
Type in name of applicant, Type in address of applicant **is seeking modification of coverage under the Washington Department of Ecology's NPDES General Permit for Stormwater Discharges Associated with Industrial Activities at the industrial site, known as** Type in site name **located at** Type in street address **in** Type in name of nearest city.

Activities requiring permit modification include Briefly describe the modification, i.e., adding the industrial process, requesting a waiver of level 2 or 3 corrective action.

Any person desiring to present their views to the Department of Ecology concerning this application may notify Ecology in writing within 30 days from the last date of publication of this notice. Comments may be submitted to:

Washington Dept of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

IV. Certification of Permittee

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Printed Name	Company	Date
Gary E. Jones	Socco Forest Products	3/2/16
Signature		Date
Gary E. Jones		3/2/16

***Federal regulations require this application is signed by one of the following:**
A. In the case of corporations, by a principal executive officer of at least the level of vice president.
B. In the case of a partnership, by a general partner of a partnership.
C. In the case of sole proprietorship, by the proprietor.
D. In the case of a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

Return this signed original document to the address below. Make sure you retain a copy for your records.

Washington Department of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

If you have any questions, please call:

- **Shawn Hopkins** 360-407-6442 or shop461@ecy.wa.gov for *Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Skagit, Snohomish, Spokane, Stevens, Walla Walla, Whatcom, and Whitman counties.*
- **Clay Keown** 360-407-6048 or ckeo461@ecy.wa.gov for *Island, King (except Seattle), and San Juan* counties.
- **Josh Klimek** 360-407-7451 or jokl461@ecy.wa.gov for city of *Seattle* and *Kitsap, Pierce, and Thurston counties*
- **Joyce Smith** 360-407-6858 or josm461@ecy.wa.gov for *Benton, Chelan, Clallam, Clark, Cowlitz, Douglas, Grays Harbor, Jefferson, Kittitas, Klickitat, Lewis, Mason Okanogan, Pacific, Skamania, Wahkiakum, and Yakima counties.*

To ask about the availability of this document in a version for the visually impaired call the Water Quality Program at 360-407-6600. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.